



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

June 30, 2005

Community Reinvestment Act **Performance Evaluation**

**National City Bank
Charter Number: 786
1900 E. Ninth Street
Cleveland, Ohio 44114**

**Office of the Comptroller of the Currency
Large Bank Division
250 E. Street, S.W.
Washington, D.C. 20219**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated “**Outstanding**”:

The following table indicates the performance level of **National City Bank** with respect to the lending, investment, and service tests:

Performance Levels	National City Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating:

- Good level of lending activity;
- Good level of geographic distribution of HMDA loans, and excellent level of borrower distribution of HMDA loans;
- Excellent level of geographic distribution and good level of borrower distribution of small lending to businesses;
- Excellent level of leadership and responsiveness of community development loans that enhanced the overall Lending Test performance;
- Good level of investments, coupled with an excellent level of responsiveness and complexity; and
- Good retail banking services accessible to geographies and individuals of different income levels.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

Home Mortgage Loans: such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any primary metropolitan statistical area (PMSA), metropolitan statistical area (MSA), or consolidated metropolitan area (CMSA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

Description of Institution

National City Bank (NCB) is a full-service interstate bank that is a wholly owned subsidiary of National City Corporation (NCC); both are located in Cleveland, Ohio. NCC is a \$144 billion corporation with \$83 billion in deposits. NCC has five other national bank affiliates chartered in four states: Illinois, Indiana, Kentucky, and Pennsylvania. During our examination, NCC was in the process of combining these banking affiliates into one aggregate charter.

NCB's primary operations are in the state of Ohio. Since the last CRA evaluation, interstate branching occurred in Florida, Illinois, Michigan, and Pennsylvania. These areas represent a very small segment of the bank's overall market. These offices do not offer traditional banking services such as retail deposits and loans. Two Florida branches were setup to perform trust activities. The West Palm Beach location was the result of a merger in June 1999 with National City Bank Trust Company (West Palm Beach) and the Naples branch was a de novo bank. The establishment of the Illinois, Michigan, and Pennsylvania branches in 2000 was the result of strategic commercial lending initiatives. For additional information see details under the respective state review herein.

NCB reported total assets of \$70 billion as of June 30, 2005. Total loans of \$55 billion are comprised of commercial loans (42%), residential mortgage loans (44%), and consumer loans (14%). Total Tier 1 Capital is \$4.7 billion. Tier 1 Capital dramatically increased (by approximately \$1 billion or 32%) in the latter part of the evaluation period due to merger activity. For analysis purposes, we gave greater consideration to pre-merger Tier 1 Capital as this was more reflective of the bank's capital position during most of the review period.

We used the lending, investment, and community development activities of four affiliated non-bank entities and five bank entities in this evaluation. Additionally, CRA activities subsequent to the acquisitions of Provident Bank, (Cincinnati, Ohio) in July 2004 and Wayne County National Bank, (Wooster, Ohio) in October 2004 were included. Refer to Appendix A for further identification of the entities and their activities considered in this evaluation.

NCB has no financial or legal barriers that limit its ability to meet identified credit needs within its assessment areas. A major focus of the bank is community development initiatives, particularly in its role as a partner through its community development corporation.

The bank received an "Outstanding" rating at the last CRA examination dated February 2000. At that time, the bank was an intrastate bank with all branches located in Ohio.

Refer to the Market Profiles in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation assesses the bank's performance under the Lending Tests from October 1, 1999 through December 31, 2004. The Investment and Service Tests, and community development (CD) activities are assessed from February 23, 2000 through June 30, 2005. The start dates noted above (October 1, 1999 and February 23, 2000) represent the days immediately following the end of the time period covered in the previous performance evaluation.

During the evaluation period, there were two census statistics, 1990 and 2000. The new 2000 census redefined numerous boundaries and geographic income levels. As part of this process, new geographies were created, and some existing geographies were eliminated. These changes were effective January 1, 2003. In addition, as of January 2004, the Office of Management and Budget (OMB) redefined MSA definitions, including some assessment area boundaries. The impact of these changes was of significant magnitude as to warrant three separate analyses, one for each of the three time periods included in this evaluation. The first time period includes data from October 1, 1999 through year-end 2002, and is based on 1990 census data. The second time period included data from January 1, 2003 through year-end 2003, and is based on 2000 census data. The third time period included data from January 1, 2004 through June 30, 2005, and is based on updated 2000 OMB census data. Data for all three of these time periods was considered in this evaluation. Weightings vary among Performance Test analyses due to the aforementioned changes. See the Ratings and individual Performance Test for additional detail.

Lending Test data is provided in three sets of Lending Test Tables in Appendix D, one for each of the three time periods described above.

One Investment Test table is included in Appendix D that reflects the entire evaluation period.

Service test analyses include consideration of the bank's activities at the end of each of the three time periods included in this evaluation. One Service Test table is included in Appendix D that reflects retail branches as of June 30, 2005.

It is important to note that although the CRA regulation allows banks to receive credit for loans or pools of loans purchased from other financial institutions, NCB's lending efforts center on loans originated directly by the bank and its affiliates. The bank has negligible externally purchased loan activity. NCC affiliates do, however, purchase and sell loans from each other to expedite their ability to sell packages of loans to the secondary market. As dictated by HMDA reporting requirements, NCB and its affiliates report loans purchased from other NCC affiliates as 'purchased loans'. While the standard Performance Data tables in Appendix D generally include both originated and purchased loans, tables in this Performance Evaluation will show only originations, as this more accurately reflects NCB's home mortgage performance.

In evaluating the bank's lending performance, we reviewed NCB's residential mortgage loans and small business loans. An analysis of multi-family loans and small farm lending was not considered meaningful (each represented less than 2% of the number of reportable loans during the evaluation period); and therefore, was not considered in the evaluation of the bank's performance.

Data Integrity

The scope of this examination included a review of the accuracy of bank data utilized to develop our conclusions and ratings. The data tested for accuracy includes Home Mortgage Disclosure Act (HMDA) and CRA small loans to businesses. We also reviewed the accuracy of non-public data for qualified investments, community development services, and community development loans. The tests were performed at the corporate level and included all national bank affiliates, subsidiaries and non-bank affiliates contributing to the bank's CRA performance.

HMDA data for 2000-2003 contained significant errors, including incorrect product codes and non-reportable home-equity lines of credit. Corrected bank data was used in this evaluation. No material errors were identified in small loans to businesses data reported by the bank. Community development loans, investments, and services were accurate.

Selection of Areas for Full-Scope Review

We selected six of the 24 bank delineated Assessment Areas (AAs) for full-scope review. In each state where the bank has an office, a sample of AAs within that state was selected for full-scope reviews. Refer to the "Scope" section under each state rating for details regarding how the areas were selected and why they are representative.

Ratings

The overall Lending, Investment, and Service Test ratings are based primarily on conclusions drawn on those areas that received full-scope reviews.

The bank's overall rating is a blend of state ratings. Ratings were determined by considering lending, investment, and service activity in relation to the bank's presence within each full-scope AA. When consolidating AA conclusions into state ratings, particularly in the state of Ohio, the community with the larger banking presence received more weight than those with a smaller banking presence. This same analogy was applied when consolidating the state ratings into the overall bank rating. The state of Ohio received more weight than the other states where the bank had limited presence and limited retail banking activities.

Refer to the "Scope" section under each state rating for details regarding how the areas were weighted in arriving at the overall state rating.

Fair Lending Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

State Rating

State of Ohio

CRA Rating for Ohio: Outstanding
The lending test is rated: Outstanding
The investment test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating:

- Good level of lending activity;
- Good level of geographic distribution of HMDA loans, and excellent level of borrower distribution of HMDA loans;
- Excellent level of geographic distribution and good level of borrower distribution of small lending to businesses;
- Excellent level of leadership and responsiveness of community development loans that enhanced the overall Lending Test performance;
- Good level of investments, coupled with an excellent level of responsiveness and complexity; and
- Good retail banking services accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Ohio

As of June 30, 2005, NCB is the fourth largest banking institution in the state of Ohio. The bank has total assets of \$70 billion and is the lead deposit taking institution with deposits of \$32 billion and a 16% market share. The primary local competitors are KeyBank, N.A., Charter One Bank, N.A., and Fifth Third Bank. The primary out-of-area mortgage competitors are Countrywide and Wells Fargo. The bank has 24 defined AAs in Ohio, which includes 14 MSAs. Within the state, the bank operates 348 branch offices.

Refer to the Market Profiles for the state of Ohio in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Ohio

We selected two of NCB's 24 AAs, for full-scope review (the Cleveland-Elyria-Mentor MSA and the Columbus MSA). These AAs represent the bank's major markets, and contain the most significant percentages of deposits, branches and lending activity. NCB's performance in the Cleveland-Elyria-Mentor MSA received greater weight than the Columbus MSA because it represents the bank's primary market, and contains the largest percentage of the bank's deposits and branches, 68% and 24% respectively, as of June 2005. Additionally, the bank is headquartered in this MSA. The Columbus MSA contains 8% of the bank's deposits and 17% of the bank's branches as of June 2005. Refer to Appendix A for additional information regarding the AAs receiving full-scope and limited-scope reviews.

When determining conclusions for each AA under the Lending Test, we weighted home mortgage loans more heavily than small loans to businesses. For the entire evaluation period, home mortgage loans in the Cleveland-Elyria-Mentor MSA represented 69% of the reportable CRA loans and 81% in the Columbus MSA. We gave additional consideration to the bank's home purchase performance, as this loan type was identified by community groups as a critical credit need. NCB's home improvement loan volume did not reflect a substantial portion of home mortgage lending in either the Cleveland-Elyria-Mentor MSA (13%) or the Columbus MSA (8%). Additional home improvement lending data that is included in the bank's consumer loan portfolio was not available during this evaluation, and therefore, was not given consideration.

As explained earlier, this Evaluation includes three time periods, each of different length. Loan volume varied among the three time periods with the most volume occurring in the first time period. The first time period of this evaluation received the most weight because it encompasses most of the evaluation period and has the most volume.

NCB's state ratings under each performance test are primarily based on the consolidation of conclusions reached for each full-scope AA. When consolidating AA conclusions into overall ratings, we gave more weight to the Cleveland-Elyria-Mentor MSA than the Columbus MSA. This decision was based on the aforementioned discussion on NCB's presence in the Cleveland-Elyria-Mentor MSA.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending test is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Cleveland-Elyria-Mentor MSA is excellent and in the Columbus MSA is good.

Lending Activity

Refer to Table 1 in the State of Ohio section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending Test performance is heavily weighted on the time period that contains the most lending activity. We analyzed the bank's lending performance for each of the three time periods. However, the first time period has the most volume, and accounts for three fifths of the entire evaluation period. This weighting scheme most accurately reflects the bank's performance. Additionally, in both the Cleveland-Elyria-Mentor MSA and Columbus MSA, more weight is placed on performance in the larger market (moderate-income geographies).

Cleveland-Elyria-Mentor MSA

NCB's lending activity demonstrates good responsiveness to the credit needs of its AA considering its size, resources, deposit market share and primary business focus. The bank's lending activity is supported by its HMDA market rankings that were near to its deposit market rank. During the evaluation period, the FDIC Deposit market share data ranked the bank as the second largest deposit taker in the MSA. More recent FDIC Deposit market share data (June 30, 2005) reflects that NCB is now the lead deposit taker (\$20 billion), with a deposit market share of 32%, among 44 financial institutions with offices in this MSA. In comparison, during the evaluation period, the bank's HMDA lending ranked in the top five (with market shares ranging from 4% - 9%) of all lenders operating in the MSA. Lending market share is much smaller than deposit market share and reflects that there are many lenders in the MSA, including out-of-area mega lenders and mortgage companies. For its small loans to businesses lending, the bank is ranked below its deposit market rank primarily due to credit card and finance companies operating in the MSA that have a higher market presence. These companies offer their products nation-wide and have vast advertising strategies to reach markets.

During the first time period, the bank's HMDA market rank was near to its deposit market rank. Annual FDIC deposit market share data as of June 30, 2002 ranked the bank as the second largest deposit taker with a market share of 19%. The bank's market rankings for home purchase, home improvement, and refinance were third (6% market share), second (11% market share), and fifth (4% market share), respectively. The bank's small loans to businesses market rank was eighth (5% market share) and was below the deposit market rank.

During the second time period, the bank's HMDA and small loans to businesses market ranks were near to its deposit market rank. Annual FDIC deposit market share data as of June 30, 2003 ranked the bank as the second largest deposit taker with a market share of 23%. The bank's market rankings for home purchase, home improvement, and refinance were third (6% market share), fourth (9% market share), and fourth (6% market share), respectively. Also, the bank's market rank for small loans to businesses was sixth (5% market share).

During the third time period, the bank's HMDA and small loans to businesses market ranks were near to its deposit market rank. Annual FDIC deposit market share data as of June 30, 2004 ranked the bank as the second largest deposit taker with a market share of 20%. Market rankings for home purchase, home improvement, and refinance were third (6% market share), fifth (9% market share), and fifth (5% market share), respectively. Also, the bank's market rank for small loans to businesses was sixth (6% market share).

The following highlights NCB's lending volume in the Cleveland-Elyria-Mentor MSA during the evaluation period:

During the first time period, approximately 68% of the total number and 72% of the total dollars of NCB's CRA reportable loans were home mortgage loans. Of the \$1.8 billion in home mortgage loans originated, home purchase, home improvement, and refinance were approximately 29%, 19%, and 52%, respectively. Nearly 32% of the total number and 28% of the dollars of NCB's CRA reportable loans were small loans to businesses.

During the second time period, approximately 77% of the total number and 82% of the total dollars of NCB's CRA reportable loans were home mortgage loans. Of the \$1 billion in home mortgage loans originated, home purchase, home improvement, and refinance were approximately 30%, 3%, and 67%, respectively. Nearly 23% of the total number and 18% of the dollars of NCB's CRA reportable loans were small loans to businesses.

During the third time period, approximately 65% of the total number and 70% of the total dollars of NCB's CRA reportable loans were home mortgage loans. Of the \$623 million in home mortgage loans originated, home purchase, home improvement, and refinance were approximately 43%, 7%, and 50%, respectively. Nearly 35% of the total number and 30% of the dollars of NCB's CRA reportable loans were small loans to businesses.

Columbus MSA

NCB's lending activity demonstrates excellent responsiveness to the credit needs of its AA considering its size, resources, deposit market share and primary business focus. The bank's lending activity is supported by its HMDA market rankings that primarily met or exceeded its deposit market rank in all time periods. During the evaluation period, the FDIC Deposit market share data ranked the bank as the fourth largest deposit taker in the MSA. More recent FDIC Deposit market share data (June 30, 2005) continues to reflect NCB as the fourth largest deposit-taker (\$2 billion) with a market share of 9% among 57 financial institutions with offices in this MSA. In comparison, for its HMDA lending during the evaluation period, the bank ranked primarily in the top four of all lenders operating in the MSA. Particularly, for home mortgage loans, the bank was ranked number one for the entire evaluation period. For its small loans to businesses lending, the bank is ranked below its deposit market rank due to credit card and finance companies operating in the MSA that have a higher market presence. These

companies offer their products nation-wide and have vast advertising strategies to reach markets.

During the first time period, annual FDIC deposit market share data as of June 30, 2002 ranked the bank as the fourth largest deposit taker with a market share of 9%. Market rankings for home purchase, home improvement, and refinance were first (11% market share), second (11% market share), and fourth (5% market share), respectively. The bank's market rank for small loans to businesses was ninth (5% market share) and was below the deposit market rank.

During the second time period, annual FDIC deposit market share data as of June 30, 2003 ranked the bank as the fourth largest deposit taker with a market share of 8%. Market rankings for home purchase, home improvement, and refinance were first (11% market share), fourth (6% market share), and fourth (6% market share), respectively. The bank's market rank for small loans to businesses was seventh (6% market share) and was below the deposit market share.

During the third time period, annual FDIC deposit market share data as of June 30, 2004 ranked the bank as the fourth largest deposit taker with market share of 9%. Market rankings for home purchase, home improvement, and refinance were first (8% market share), eighth (3% market share), and second (6% market share), respectively. The bank's market rank for small loans to businesses was eighth (4% market share) and was below the deposit market share.

The following highlights NCB's lending volume in the Columbus MSA during the evaluation period:

During the first time period, approximately 79% of the total number and 85% of the total dollars of NCB's CRA reportable loans were home mortgage loans. Of the \$2.3 billion in home mortgage loans originated, home purchase, home improvement, and refinance loans were approximately 44%, 13%, and 43%, respectively. Approximately 21% of the total number and 15% of the dollars of NCB's CRA reportable loans were small loans to businesses.

During the second time period, approximately 86% of the total number and 91% of the total dollars of NCB's CRA reportable loans were home mortgage loans. Of the \$1.4 billion in home mortgage loans originated, home purchase, home improvement, and refinance were approximately 41%, 1%, and 58%, respectively. Approximately 14% of the total number and 9% of the dollars of NCB's CRA reportable loans were small loans to businesses.

During the third time period, approximately 78% of the total number and 85% of the total dollars of NCB's CRA reportable loans were home mortgage loans. Of the \$904 million in home mortgage loans originated, home purchase, home improvement, and refinance were approximately 54%, 3%, and 43%, respectively. Approximately 22% of the total number and 15% of the dollars of NCB's CRA reportable loans were small loans to businesses.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in the State of Ohio section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.

NCB's overall geographic distribution of HMDA loans and small loans to businesses is good. This conclusion is based on home mortgage performance in the Cleveland-Elyria-Mentor MSA that is good, and in the Columbus MSA that is adequate. The bank's small loans to businesses performance in the Cleveland-Elyria-Mentor MSA is excellent; and in the Columbus MSA it is good.

Cleveland-Elyria-Mentor MSA

Home Purchase

NCB's geographic distribution of home purchase loans in the Cleveland-Elyria-Mentor MSA is excellent. The bank's distribution of home purchase loans in low-income geographies is good, and in moderate-income geographies is excellent.

During the first time period, the bank's percentage of home purchase loans made in both the low- and moderate-income geographies exceeds the percentages of owner-occupied housing units in those geographies. The bank's home purchase market share in both the low- and moderate-income geographies exceeds its overall home purchase market share.

During the second time period, the bank's percentage of home purchase loans made in low-income geographies is less than the percentage of owner-occupied housing units in those geographies. The percentage of the bank's home purchase loans made in moderate-income geographies is near to the percentage of owner-occupied housing units in those geographies. The bank's home purchase market share in low-income geographies is less than its overall home purchase market share. The bank's home purchase market share in moderate-income geographies substantially meets its overall home purchase market share.

During the third time period, the bank's percentage of home purchase loans made in low-income geographies is significantly less than the percentage of owner-occupied housing units in those geographies. The percentage of the bank's home purchase loans made in moderate-income geographies is near to the percentage of owner-occupied housing units in those geographies. The bank's home purchase market share in low-income geographies is significantly less than its overall home purchase market

share. The bank's home purchase market share in moderate-income geographies substantially meets its overall home purchase market share.

Home Improvement

NCB's geographic distribution of home improvement loans in the Cleveland-Elyria-Mentor MSA is excellent. The bank's distribution of home improvement loans in both the low- and moderate-income geographies is excellent.

During the first time period, the bank's percentage of home improvement loans made in both the low- and moderate-income geographies exceeds the percentages of owner-occupied housing units in those geographies. The bank's home improvement market share in low- and moderate-income geographies substantially meets its overall home improvement market share.

During the second time period, the bank's percentage of home improvement loans made in both the low- and moderate-income geographies exceeds the percentages of owner-occupied housing units in those geographies. The bank's home improvement market share in low-income geographies exceeds its overall home improvement market share. The bank's home improvement market share in moderate-income geographies substantially meets its overall home improvement market share.

During the third time period, the bank's percentage of home improvement loans made in both the low- and moderate-income geographies exceeds the percentages of owner-occupied housing units in those geographies. The bank's home improvement market share in low-income geographies exceeds its overall home improvement market share. The bank's home improvement market share in moderate-income geographies substantially meets its overall home improvement market share.

Refinance

NCB's geographic distribution of refinance loans in the Cleveland-Elyria-Mentor MSA is adequate. The bank's distribution of refinance loans in both the low- and moderate-income geographies is adequate.

During the first time period, the bank's percentage of refinance loans made in both the low- and moderate-income geographies is less than the percentage of owner-occupied housing units in those geographies. The bank's refinance market share in both the low- and moderate-income geographies substantially meets its overall refinance market share.

During the second time period, the bank's percentage of refinance loans made in low-income geographies is significantly less than the percentage of owner-occupied housing units in those geographies. The percentage of its refinance loans made in moderate-income geographies is less than the percentage of owner-occupied housing units in

those geographies. The bank's refinance market share in low-income geographies is less than its overall refinance market share. The bank's refinance market share in moderate-income geographies substantially meets its overall refinance market share.

During the third time period, the bank's percentage of refinance loans made in both the low- and moderate-income geographies is less than the percentages of owner-occupied housing units in those geographies. The bank's refinance market share in low- and moderate-income geographies is less than its overall refinance market share.

Columbus MSA

Home Purchase

NCB's geographic distribution of home purchase loans in the Columbus MSA is adequate. The bank's distribution of home purchase loans in both the low- and moderate-income geographies is adequate.

During the first time period, the bank's percentage of home purchase loans made in low-income geographies is significantly less than the percentage of owner-occupied housing units in those geographies. The percentage of its home purchase loans made in moderate-income geographies is less than the percentage of owner-occupied housing units in those geographies. The bank's home purchase market share in low-income geographies is significantly less than its overall home purchase market share. The bank's home purchase market share in moderate-income geographies is less than its overall home purchase market share.

During the second time period, the bank's percentage of home purchase loans made in both the low- and moderate-income geographies is less than the percentage of owner-occupied housing units in those geographies. The bank's home purchase market share in low-income geographies is less than its overall home purchase market share. The bank's market share in moderate-income geographies is less than its overall home purchase market share.

During the third time period, the bank's percentage of home purchase loans made in low-income geographies is near to the percentage of owner-occupied housing units in those geographies. The percentage of its home purchase loans made in moderate-income geographies is less than the percentage of owner-occupied housing units in those geographies. The bank's home purchase market share in low-income geographies is less than its overall home purchase market share. The bank's home purchase market share in moderate-income geographies exceeds its overall home purchase market share.

Home Improvement

NCB's geographic distribution of home improvement loans in the Columbus MSA is excellent. The bank's distribution in both the low- and moderate-income geographies is excellent.

During the first time period, the bank's percentage of home improvement loans made in both the low- and moderate-income geographies exceeds the percentage of owner-occupied housing units in those geographies. The bank's home improvement market share in both low-and moderate-income geographies exceeds its overall home improvement market share.

During the second time period, the bank's percentage of home improvement loans made in both the low- and moderate-income geographies exceeds the percentage of owner-occupied housing units in those geographies. The bank's home improvement market share in low-income geographies substantially meets its overall home improvement market share. The bank's home improvement market share in moderate-income exceeds its overall home improvement market share.

During the third time period, the bank's percentage of home improvement loans made in low-income geographies significantly exceeds the percentage of owner-occupied housing units in those geographies. The percentage of its home improvement loans made in moderate-income geographies is near to the percentage of owner-occupied housing units in those geographies. The bank's home improvement market share in low-income geographies significantly exceeds its overall home improvement market share. The bank's home improvement market share in moderate-income geographies substantially meets its overall home improvement market share.

Refinance

NCB's geographic distribution of refinance loans in the Columbus MSA is adequate. The bank's distribution of refinance loans in both the low- and moderate-income geographies is adequate.

During the first time period, the bank's percentage of refinance loans made in both the low- and moderate-income geographies is less than the percentage of owner-occupied housing units in those geographies. The bank's refinance market share in both the low- and moderate-income geographies substantially meets its overall refinance market share.

During the second time period, the bank's percentage of refinance loans made in both the low- and moderate-income geographies is less than the percentage of owner-occupied housing units in those geographies. The bank's refinance market share in both the low- and moderate-income geographies substantially meets its overall refinance market share.

During the third time period, the bank's percentage of refinance loans made in low-income geographies exceeds the percentage of owner-occupied housing units in those geographies. The percentage of its refinance loans made in moderate-income geographies is near to the percentage of owner-occupied housing units in those geographies. The bank's refinance market share in both the low- and moderate-income geographies substantially meets the bank's overall refinance market share.

Small Loans to Businesses

Refer to Table 6 in the State of Ohio section of Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination of small loans to businesses.

Cleveland-Elyria-Mentor MSA

NCB's geographic distribution of small loans to businesses in the Cleveland-Elyria-Mentor MSA is excellent. The bank's distribution of small loans to businesses in both the low- and moderate-income geographies is excellent.

During the first time period, the bank's percentage of small loans to businesses made in both low-and moderate-income geographies exceeds the percentage of businesses in those geographies. The bank's small loans to businesses market share in both the low- and moderate-income geographies exceeds its overall small loans to businesses market share.

During the second time period, the bank's percentage of small loans to businesses made in low-income geographies is less than the percentage of businesses within those geographies. The percentage of its small loans to businesses made in moderate-income geographies is near to the percentage of businesses within those geographies. The bank's small loans to businesses market share in low-income geographies substantially meets its overall small loan to businesses market share. The bank's small loans to businesses market share in moderate-income geographies exceeds its overall small loans to businesses market share.

During the third time period, the bank's percentage of small loans to businesses made in low-income geographies is less than the percentage of businesses within those geographies. The percentage of its small loans to businesses made in moderate-income geographies is near to the percentage of businesses within those geographies. The bank's small loans to businesses market share in both the low- and moderate-income geographies substantially meets its overall small loans to businesses market share.

Columbus MSA

NCB's geographic distribution of small loans to businesses in the Columbus MSA is good. The performance of small loans to businesses in low-income geographies is excellent and in moderate-income geographies is good.

During the first time period, the percentage of small loans to businesses made in low-income geographies exceeds the percentage of businesses located within those geographies. The percentage of its small loans to businesses made in moderate-income geographies is near to the percentage of businesses within those geographies. The bank's small loans to businesses market share in low-income geographies exceeds its overall small loans to businesses market share. The bank's small loans to businesses market share in moderate-income geographies substantially meets its overall small loans to businesses market share.

During the second time period, the bank's percentage of small loans to businesses made in low-income geographies exceeds the percentage of those businesses within those geographies. The percentage of its small loans to businesses made in moderate-income geographies is near to the percentage of businesses within those geographies. The bank's small loans to business market share in both the low- and moderate-income geographies exceeds its overall small loans to businesses market share.

During the third time period, the bank's percentage of small loans to businesses made in both the low- and moderate-income geographies is near to the percentage of businesses within those geographies. The bank's small loans to business market share in both the low- and moderate-income geographies exceeds its overall small loans to businesses market share.

Small Loans to Farms

The volume of small farm lending in the Cleveland-Elyria-Mentor MSA and the Columbus MSA is minimal and was not analyzed as part of this evaluation.

Lending Gap Analysis

The bank's lending activity over the evaluation period for home mortgage loans and small loans to businesses was reviewed to identify gaps in the geographic distribution of loans. No unexplained conspicuous gaps in lending were identified.

Inside/Outside Ratio

The inside/outside ratio analysis was performed at the state level as opposed to the AA level. It includes originations only (see Description of Institution), and does not include any affiliate lending.

A substantial majority of the bank's lending is within its AAs in Ohio. The bank originated 95% of its home mortgage lending and 97% of its small loans to businesses within the state of Ohio. All community development lending is within the bank's AAs. The bank's lending within its AAs positively impacts the overall analysis of its geographic distribution of loans.

Distribution of Loans by Income Level of the Borrower

NCB's overall borrower distribution of HMDA loans is excellent. This conclusion is based on home mortgage performance in the Cleveland-Elyria-Mentor MSA that is excellent and in the Columbus MSA is good. The bank's small loans to businesses performance in the Cleveland-Elyria-Mentor MSA is good and in the Columbus MSA is adequate.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the State of Ohio section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.

Note that the expectation for the percentage of lending to low-income borrowers is not as high as for moderate-income borrowers because of impediments caused by lack of affordable housing, and a high percentage of the population living below poverty levels.

Cleveland-Elyria-Mentor MSA

Home Purchase

NCB's borrower distribution of home purchase loans in the Cleveland-Elyria-Mentor MSA is excellent. The bank's distribution of home purchase loans to low-income borrowers is adequate. However, taking into account the above-mentioned impediments, performance is considered good and substantiated by home purchase market share to low-income borrowers that consistently exceeded the bank's overall home purchase market share. Additionally, the bank's distribution of home purchase loans to moderate-income borrowers is excellent.

During all three time periods, the bank's percentages of home purchase loans made to low-income borrowers are less than the percentage of those families in the AA. The percentages of its home purchase loans made to moderate-income borrowers significantly exceed the percentage of those families in the AA. Home purchase market share for both the low-and moderate income borrowers exceeds its overall home purchase market share, with the exception of the second time period, where moderate-income market share substantially meets the overall home purchase market share.

Home Improvement

NCB's borrower distribution of home improvement loans in the Cleveland-Elyria-Mentor MSA is excellent. The bank's distribution of home improvement loans to low-income borrowers is adequate and generally less than the percentage of low-income families. However, when considering the above-mentioned impairments, performance is considered good. Performance is further enhanced by the bank's home improvement market share to low-income borrowers that is consistently higher than its overall home improvement market share. Additionally, the bank's distribution of home improvement loans to moderate-income borrowers is excellent.

During the first time period, the bank's percentage of home improvement loans made to low-income borrowers is less than the percentage of those borrowers in the AA. The percentage of its home improvement loans made to moderate-income borrowers exceeds the percentage of those families in the AA. The bank's home improvement market share for low-income borrowers exceeds its overall home improvement market share. The bank's home improvement market share for moderate-income borrowers substantially meets its overall home improvement market share.

During the second time period, the percentage of home improvement loans made to low-income borrowers is near to the percentage of those families in the AA. The percentage of its home improvement loans made to moderate-income borrowers exceeds the percentage of those families in the AA. The bank's home improvement market share for low-income borrowers exceeds its overall home improvement market share. The bank's home improvement market share for moderate-income borrowers substantially meets its overall home improvement market share.

During the third time period, the bank's percentage of home improvement loans made to low-income borrowers is less than the percentage of those borrowers in the AA. The percentage of its home improvement loans made to moderate-income borrowers exceeds the percentage of those families in the AA. The bank's home improvement market share for low-income borrowers exceeds its overall home improvement market share. The bank's home improvement market share for moderate-income borrowers substantially meets its overall home improvement market share.

Refinance

The borrower distribution of refinance loans made in the Cleveland-Elyria-Mentor MSA is good. NCB's borrower distribution to low-income borrowers is poor. However, taking into account the above-mentioned impediments, performance is considered adequate. Performance is further enhanced by the bank's refinance market share to low-income borrowers that is higher than its overall refinance market share. Borrower distribution to moderate-income borrowers is excellent.

During the first time period, the bank's percentage of refinance loans made to low-income borrowers is significantly less than the percentage of those families in the AA. The percentage of its refinance loans made to moderate-income borrowers exceeds the percentage of those families in the AA. The bank's refinance market share for low-income borrowers exceeds its overall refinance market share. The bank's refinance market share for moderate-income borrowers substantially meets its overall refinance market share.

During the second time period, the bank's percentage of refinance loans made to low-income borrowers is less than the percentage of those families in the AA. The percentage of its refinance loans made to moderate-income borrowers exceeds the percentage of those families in the AA. The bank's refinance market share for low-income borrowers exceeds its overall refinance market share. The bank's refinance market share for moderate-income borrowers substantially meets its overall refinance market share.

During the third time period, the bank's percentage of refinance loans made to low-income borrowers is significantly less than the percentage of those families in the AA. The percentage of its refinance loans made to moderate-income borrowers exceeds the percentage of those families in the AA. The bank's refinance market share for low-income borrowers exceeds its overall refinance market share. The bank's refinance market share for moderate-income borrowers substantially meets its overall refinance market share.

Columbus MSA

Home Purchase

NCB's borrower distribution of home purchase loans in the Columbus MSA is good. The bank's distribution of home purchase loans to low-income borrowers is poor. However, taking into account the above-mentioned impediments, performance is considered adequate. Performance is further enhanced by strong home purchase market share that is generally higher than its overall home purchase market share. Additionally, the bank's distribution of home purchase loans to moderate-income borrowers is excellent.

During the first time period, the bank's percentage of home purchase loans made to low-income borrowers is significantly less than the percentage of those families in the AA. The percentage of its home purchase loans made to moderate-income borrowers exceeds the percentage of those families in the AA. The bank's home purchase market share for low-income borrowers substantially meets its overall home purchase market share. The bank's home purchase market share for moderate-income borrowers exceeds its overall home purchase market share.

During the second time periods, the bank's percentage of home purchase loans made to low-income borrowers is less than the percentage of those families in the AA. Its percentage of home purchase loans made to moderate-income borrowers exceeds the percentage of those families in the AA. The bank's home purchase market share for both the low- and moderate-income borrowers exceeds its overall home purchase market share.

During the third time period, the bank's percentage of home purchase loans made to low-income borrowers is significantly less than the percentage of those families in the AA. Its percentage of home purchase loans made to moderate-income borrowers exceeds the percentage of those families in the AA. The bank's home purchase market share for both the low- and moderate-income borrowers exceeds its overall home purchase market share.

Home Improvement

NCB's borrower distribution of home improvement loans in the Columbus MSA is excellent. The bank's distribution of home improvement performance to low-income borrowers is adequate and generally less than the percentage of low-income families. However, taking into account the above-mentioned impediments, performance is considered good. Performance is further enhanced by home improvement market share to low-income borrowers that consistently exceeded its overall home improvement market share. Additionally, the bank's distribution of home improvement loans to moderate-income borrowers is excellent.

During the first time period, the bank's percentage of home improvement loans made to low-income borrowers is less than the percentage of those families in the AA. The percentage of its home improvement loans made to moderate-income borrowers exceeds the percentage of those families in the AA. The bank's home improvement market share for both the low- and moderate-income borrowers exceeds its overall home improvement market share.

During the second time period, the bank's percentage of home improvement loans made to both the low- and moderate-income borrowers exceeds the percentages of those families in the AA. The bank's home improvement market share for low-income borrowers exceeds its overall home improvement market share. The bank's home improvement market share for moderate-income borrowers substantially meets its overall home improvement market share.

During the third time period, the bank's percentage of home improvement loans made to low-income borrowers is near to the percentage of those families in the AA. The percentage of its home improvement loans made to moderate-income borrowers exceeds the percentage of those families in the AA. The bank's home improvement market share for low-income borrowers exceeds its overall home improvement market share. Its home improvement market share for moderate-income borrowers substantially meets the bank's overall home improvement market share.

Refinance

NCB's borrower distribution of refinance loans in the Columbus MSA is good. The bank's distribution of refinance loans to low-income borrowers is poor. However, taking into account the above-mentioned impediments, performance is considered adequate. Performance is further enhanced by refinance market share to low-income borrowers that consistently exceeds its overall refinance market share. Additionally, the bank's distribution of refinance loans to moderate-income borrowers is excellent.

During the first time period, the bank's percentage of refinance loans made to low-income borrowers is significantly less than the percentage of those families in the AA. The percentage of its refinance loans made to moderate-income borrowers exceeds the percentage of those families in the AA. The bank's refinance market share for low-income borrowers exceeds its overall refinance market share. The bank's refinance market share for moderate-income borrowers substantially meets its overall refinance market share.

During the second time period, the bank's percentage of refinance loans made to low-income borrowers is significantly less than the percentage of those families in the AA. The percentage of its refinance loans made to moderate-income borrowers exceeds the percentage of those families in the AA. The bank's refinance market share for both the low- and moderate-income borrowers exceeds its overall refinance market share.

During the third time period, the bank's percentage of refinance loans to low-income borrowers is less than the percentage of those families in the AA. The percentage of its refinance loans made to moderate-income borrowers exceeds the percentage of those families in the AA. The bank's refinance market share for both the low- and moderate-income borrowers exceeds its overall refinance market share.

Small Loans to Businesses

Refer to Table 11 in the State of Ohio section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to businesses.

Cleveland-Elyria-Mentor MSA

NCB's borrower distribution of small loans to businesses in the Cleveland-Elyria-Mentor MSA is good. Borrower distribution is substantiated by the bank's market share performance for businesses with revenues less than \$1 million that consistently exceeds its overall small loans to businesses market share.

During the first and second time periods, the bank's percentages of small loans to businesses are less than the percentage of businesses in the AA.

During the third time period, the bank's percentage of small loans to businesses substantially meets the percentage of businesses in the AA.

During all time periods, the bank's small business market share for businesses with revenues less than \$1 million exceeds its overall small business market share. The bank made a majority of these loans in amounts less than \$100 thousand.

Columbus MSA

NCB's borrower distribution of small loans to businesses in the Columbus MSA is adequate.

For the first and second time periods, the bank's percentages of small loans to businesses are less than the percentage of businesses in the AA.

For the third time period, the bank's percentage of small loans to businesses substantially meets the percentage of businesses in the AA.

During all time periods, the bank's small business market share for businesses with revenues less than \$1 million exceeds its overall small business market share. The bank made a majority of these loans in amounts less than \$100 thousand.

Community Development Lending

Refer to Table 1 in the State of Ohio section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

Community development (CD) lending has a positive impact on lending performance in both the Cleveland-Elyria-Mentor MSA and the Columbus MSA and was a major factor in the overall "Excellent" Lending Test performance. NCB's CD loans contain a high level of complexity. Complexity is primarily centered on layered financing initiatives (e.g. use of down payment assistance, tax abatements, etc.) NCB's activities involve aggressive project leadership that devotes significant time and expertise to bring

projects to fruition. Many CD loans are partnered with city, state, and local governments which provide financing options for its customers.

Cleveland-Elyria-Mentor MSA - NCB has an excellent volume of CD loans in this MSA given the affordable housing CD needs and ample opportunities coupled with high competition that exist in the AA (see market profile in Appendix B). The bank made 32 loans totaling \$110 million that directly benefited this MSA. These loans met community credit needs. Specifically, approximately 47% were for affordable housing and 34% for revitalization and stabilization. NCB, as well as its Community Development Corporation (CDC), met many financing needs of non-profit organizations and developers covering many communities. Examples include:

- A \$3.1 million construction loan was extended to a developer to build 17 market-rate homes in a moderate-income tract in the City of Lakewood. This loan is part of the City's revitalization and redevelopment strategy (economic integration) to build homes in areas that had not seen housing investment in many years. This project is part of a 57 townhome initiative with up to three live-work buildings containing at least 67 loft units. Creative financing included a five-year partial tax abatement with the first two years at 100% and the final three years at 50% plus. Buyers were eligible for NCB's loan program, NCHAMP, a discounted interest rate loan program for the end mortgage. Additionally, NCB's CDC financed three townhouse units that served as models and sales offices.
- A \$5.2 million loan was extended to a University Circle corporation to facilitate the acquisition of 198 apartments with a deli and restaurant located in a low-income tract in the City of Cleveland. Rent is subsidized for 40% of the units with the remaining 60% at market rate. This area is a central hub to two major nationally known hospitals and a university. The apartment provides needed housing for residents, college students, and interns. Additionally, this project provides revitalization and stabilization to the area by helping to attract and retain residents and businesses, including some jobs for low- and moderate-income individuals provided by the restaurant. Multiple financing sources include historic and low-income housing tax credits.
- A \$4 million bridge-loan was extended to a local food bank to build a new facility. The facility provides emergency, as well as, a regular source of food for low- and moderate-income persons. This loan will enable the entity time to acquire ample donor pledges which would in turn pay contractors.

Columbus MSA - NCB has an excellent volume of CD loans in this MSA given the affordable CD needs and ample opportunities coupled with high competition that exist in the AA (see market profile in Appendix B). The bank made 47 loans totaling \$66 million to entities servicing both low- and moderate-income areas and people. Examples include:

- A \$20 million loan was extended to a housing group to renovate and construct 1,300 units of affordable housing located in distressed low-income communities throughout Columbus, Ohio. Funds were used to provide gap financing. Additional financing for the project came from private investors and various government sources, including The Department of Housing and Urban Development, Federal Housing Administration, Ohio Housing Finance Agency, and the City of Columbus. This project represents the first revitalization efforts in these communities for decades and is part of the City's plan to revitalize downtown and urban neighborhoods.
- A \$1.8 million loan was extended to a housing partnership to purchase and rehabilitate an old vacant hotel building in a low-income community into 32 units of affordable housing for low-income elderly individuals. This property had been unoccupied since 1976. Sources of financing for this project included low-income housing tax credits, historic tax credits, and funds from the City of Columbus, Ohio Department of Development, along with funding by the bank's Community Development Corporation.

Product Innovation and Flexibility

The bank's use of flexible lending practices in the Cleveland-Elyria-Mentor MSA and Columbus MSA AA had a positive impact on the Lending Test conclusions.

NCB offers at least 14 flexible lending products that are frequently used. NCB's NCHAMP mortgage financing product is widely used throughout the State. In addition, they participate with various city and state government agencies' specialized lending programs that offer grants, down-payment assistance and homeowner counseling services to low- and moderate-income customers purchasing and rehabilitating homes.

Residential customer programs include:

Franklin County Down-payment Assistance Program (DAP) and Columbus Housing Partnership Down Payment Assistance Program (CHP), Franklin County – NCB provides mortgage financing to program participants. The programs are for first-time homebuyers with incomes 80% or below Area Median Income. Down payment allowance under the DAP program is \$2,000 and under CHP it is \$3,000 or 3% of the purchase price. All home buyers must complete homebuyer education. Homes must be purchased within respective counties.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Akron and Canton MSAs is not inconsistent with the bank's overall "Outstanding" performance under the lending test in Ohio. In the Cincinnati, Dayton, Huntington, Mansfield, Sandusky, Springfield, Steubenville-Weirton, Toledo, Wheeling, and

Youngstown MSAs, and the non-metropolitan areas, the bank's performance is weaker than the bank's overall performance in Ohio. The weaker performance is due to a less favorable geographic and/or borrower distribution of HMDA loans. Performance in limited-scope AAs did not negatively impact the Lending Test rating for Ohio. Refer to Tables 1 through 11 in the state of Ohio section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "Outstanding." Based on full-scope reviews, performance is excellent in the Cleveland-Elyria-Mentor MSA and in the Columbus MSA is good.

Refer to Table 14 in the State of Ohio section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments. To provide perspective regarding the relative level of qualified investments, we allocated a portion of the bank's Tier 1 capital to each AA based on the pro rata share of deposits. We also gave substantial consideration to the spike in bank assets (31%) and Tier I capital (32%) that occurred during the last six months of the review period. See Description of Institution for details.

Current period investments were given primary consideration in the evaluation of both full scope AAs. We also considered the fact that both AAs benefited from 123 statewide and regional investments totaling \$10 million.

Cleveland-Elyria-Mentor MSA

NCB's investment performance in this AA is excellent. The bank's resources and capacity within this market are strong. Investment opportunities in the AA are ample; however, competition for such investments is very high. Refer to the Market Profile in Appendix C for details. During the evaluation period, the bank significantly impacted the AA by making 524 qualified investments totaling \$126.5 million. Half of these investments (\$65 million) were either complex or innovative, and most were used to finance affordable housing and economic development projects. NCB also made 690 donations that totaled \$2.5 million. The donations were made to 203 different local organizations. In addition, unfunded commitments (\$30 million) reflect NCB's ongoing commitment to fund affordable housing and economic development projects. Finally, prior period investments (\$3 million) helped to re-capitalize affordable housing loan pools.

The bank's investments are highly responsive to the needs of the local community. During the evaluation period, 93% of NCB's investments, and all of its donations addressed the most urgent needs of the local community (affordable housing and

economic development). The remaining 7% of investments supported revitalization efforts within low- and moderate-income geographies.

NCB's investments are highly complex and innovative. During the evaluation period, NCB was the only bank in the AA that was actively involved in the purchase of conservation easements. The easement purchases totaled \$52 million, and provided capital injections for 15 affordable housing and economic development projects located in low- and moderate-income geographies. In addition, easement purchases required a significant outlay of technical expertise. NCB is also one of the few financial institutions in the AA that routinely utilizes direct equity and venture capital investments. The bank uses these investment vehicles to reduce risk exposure to builders, developers, and community groups, to provide capital injections, and to eliminate structured debt payments. NCB is considered by some to be a leader in direct equity investing. During the evaluation period, direct equity or venture capital projects accounted for \$13 million or 10% of the bank's investments.

The following examples highlight the bank's performance in the Cleveland AA.

- Carter Manor is a \$15 million affordable housing investment that targets very low-income families. Funds were used to renovate a former hotel into 270 rental units. The project is located in a downtown, low-income tract, which has been targeted for revitalization by the City of Cleveland. Financing for the project is considered both complex and innovative as it is a direct equity investment that utilizes a conservation easement purchase.
- Arbor Park Place is a revitalization project. Funds were used to help construct a 16,800 square foot supermarket, along with 18,000 square feet of retail space in a low-income tract. This investment significantly impacted the local community, as there were no other full service supermarkets in the immediate area. In addition, the project represents the first large scale retail development in the area in more than 40 years, and resulted in the creation of 75 permanent, service related jobs. NCB's participation in this project is considered both complex and innovative, as this represents a direct equity investment in which the bank will not receive its equity back in a traditional manner, e.g. upon exiting the partnership. Instead, the bank's return will be realized as a reduction in its tax liability. NCB contributed \$250 thousand to this project.

Columbus MSA

NCB's investment performance in this AA is good. The bank's resources and capacity within this market are limited. Investment opportunities are ample; however, competition for such investments is high. Refer to Market Profile in Appendix B for details. During the evaluation period, the bank made 189 qualified investments totaling \$3.7 million, a significant portion of which (\$3 million) were considered complex, and were used to fund affordable housing and economic development projects. NCB also made 832 donations that totaled \$3 million. The donations were made to 169 different

local organizations. In addition, unfunded commitments of \$3 million reflect NCB's ongoing commitment to fund affordable housing and economic development projects.

The bank's investments are highly responsive to community needs. During the evaluation period, all of NCB's investments addressed the most urgent needs of the local community (affordable housing and economic development). In addition, 86% of NCB's donations addressed the most pressing needs of the AA. Most of the remaining donations were extended to organizations that supported the revitalization efforts of low- and moderate-income neighborhoods.

NCB's investments are complex. The bank routinely utilizes direct equity and venture capital investments that require a significant outlay of bank equity, time, and human resources. During the evaluation period direct equity and venture capital projects accounted for \$3 million or 43% of the bank's investments.

The following examples highlight the bank's performance in the Columbus AA. All three projects are considered complex as they represent direct equity investments.

- 26th Avenue Homeownership LP Project is a \$250 thousand affordable housing investment that targets low- and moderate-income families for home ownership. Funds were used to acquire and renovate 19 abandoned single-family homes located in a moderate-income census tract.
- Eastside Hope for Homeownership is a \$319 thousand affordable housing investment designed to facilitate home ownership for low- and moderate-income families. Funds were used to construct 11 single-family homes located in a low-income census tract.
- Twentieth & Long Condominium LP Project is a \$460 thousand affordable housing investment whose primary purpose is to facilitate home ownership for low- and moderate-income families. Funds were used to renovate a vacant building into five condominiums located in a low-income census tract.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Cincinnati, and Weirton MSAs is not inconsistent with the bank's overall "Outstanding" performance under the Investment Test in Ohio. NCB's performance in the Akron, Canton, Dayton, Huntington, Mansfield, Sandusky, Springfield, Toledo, Wheeling, Youngstown MSAs, and non-metropolitan areas is weaker than the bank's overall performance in Ohio. The weaker performance is due to more weight placed on full-scope AAs. Performance in the limited-scope AAs did not negatively impact the overall Investment Test rating for Ohio. Refer to Table 14 in the State of Ohio section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "High Satisfactory." Based on full-scope reviews, performance is good in the Cleveland-Elyria-Mentor MSA and in the Columbus MSA is excellent.

Retail Banking Services

Refer to Table 15 in the State of Ohio section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

NCB's delivery systems are accessible to geographies and individuals of different income levels.

Service Test performance is weighted evenly for each of the three time periods of the evaluation. The weighting is based on the fact that the number of branches was fairly consistent, and there was no major shift in openings and closings, during the entire evaluation period. The percentage of population in low- and moderate-income geographies that was fairly even in the first time period shifted to a significantly higher percentage in moderate-income geographies during the evaluation period. In the Columbus MSA, the percentage of population in moderate- income geographies was significantly higher than low-income geographies throughout the evaluation period. Performance in moderate-income geographies was given greater consideration in both MSAs given the higher percentage of population living in those geographies.

Cleveland-Elyria-Mentor MSA

NCB's distribution of banking offices is good with adequate accessibility in low-income geographies and excellent accessibility in moderate-income geographies. During a majority of the evaluation period, the bank's percentage of banking offices in moderate-income geographies consistently exceeded the percentage of population living in those geographies.

Branch distribution in low-income geographies, for the first time period is significantly less than the percentage of population living in those areas. In the second and third time periods, performance improved but remained less than the percentage of population living in those areas. Some consideration is given to the fact that the bank has branches located in nearby moderate-income and middle-income geographies that are within one to two miles of a low-income geography.

Branch distribution in moderate-income geographies for the first time period was somewhat less, but it improved to exceed the percentage of population living in those geographies for the remaining two time periods.

The bank's record of opening and closing branches did not adversely affect the accessibility of the bank's delivery systems in this MSA. During this evaluation, the bank opened two branches and closed five branches; none were located in low- or moderate-income geographies.

The bank's services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and /or individuals. Extended hours plus Saturday hours are offered at 75% of the branches in low-income geographies and at 63% of the branches in moderate-income geographies. Detailed analyses of banking hours reflect comparable banking hours for all branches without regard to the income levels represented by the branches' geographic locations. Drive-in service is not available at branches in downtown low-income geographies; however, drive-in service is available at 25% of the branches in moderate-income geographies.

The bank offers its loan and deposit products at all banking locations, including a flexible mortgage loan program and low-cost deposit accounts. For instance:

- "Get checking" program, offered bank-wide, features a no-cost checking account for qualified applicants and requires a minimal dollar amount to open the account. Should an applicant not qualify due to a poor deposit account history, as determined by a third party vendor, Check Systems, the bank will refer the applicant to a financial counseling service. Upon completion and proof of counseling the bank will open a checking account for the applicant.
- NCB offers the "Cleveland Saves" program and the "Columbus Saves" program. Cleveland Saves was the initial pilot program for the America Saves Campaign. America Saves is a nationwide campaign in which a broad coalition of nonprofit, corporate and government groups help individuals and families save and build wealth, particularly low- and moderate-income individuals. By offering free financial education counseling and positive re-enforcers (such as advice, newsletters, and coaching), these programs assist those who wish to pay down debt, build an emergency fund, and/or save for a home, education, or retirement. NCB offers a free savings product as part of this initiative.

The bank offers various alternate systems for delivering retail banking services. NCB's automated teller machine (ATM) distribution is similar to its branch distribution. For all three time periods of the evaluation, ATMs in low-income areas represented 6% to 7% of the total number of ATMs; which is less than the 9% to 10% population living in those geographies. ATMs in moderate-income areas represented 20% to 22% of the total ATMs, which exceeds the 14% to 17% population living in those geographies. Also, several ATM's have bilingual (Spanish) and voice guided capabilities.

Other alternate delivery systems include toll-free telephone account access and on-line banking. However, the delivery systems are not specifically targeted to low- and moderate-income families or geographies. Since data on how these systems impact low- and moderate-income families and geographies was not available, significant weight could not be placed on this area when drawing conclusions on the bank's performance under the Service Test.

Columbus MSA

NCB's distribution of banking offices is excellent with excellent accessibility in both low- and moderate-income geographies. The bank's percentage of banking offices in moderate-income geographies consistently exceeded the percentage of population living in those geographies for all time periods in this evaluation.

For the evaluation period, branch distribution in low-income geographies exceeds the percentage of population living in those geographies in all time periods, except in the first time period, which is slightly less. Branch distribution in moderate-income geographies exceeds the percentage of population living within those geographies for all time periods in this evaluation.

The bank's record of opening and closing branches did not adversely affect the accessibility of its delivery systems in this MSA. During the evaluation period, the bank opened four branches and closed ten branches, one of which was located in a low-income geography and two were in moderate-income geographies. Customers of these branches were serviced by other bank branches located nearby.

The bank's services are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. Extended hours plus Saturday hours are offered at 75% of the branches in low-income geographies and at 100% of the branches in moderate-income geographies. Drive-in service is available at 75% of the branches in low-income geographies and 88% of the branches in moderate-income geographies. The bank offers its loan and deposit products at all banking locations, including a flexible mortgage loan program and low-cost deposit accounts. See comments in the Cleveland-Elyria-Mentor MSA above regarding the retail services that are offered.

The bank offers various alternate systems for delivering retail banking services. ATM distribution is similar to branch distribution and offers an effective and readily accessible delivery system throughout this MSA. For all three time periods of the evaluation, ATMs located in low-income geographies represented 13% to 15% of the total number of ATMs; which exceeded the 7% to 9% population living in those geographies. ATMs located in moderate-income areas represented 27% to 33% of the total ATMs, which exceeded the 20% to 23% population living in those areas. Additionally, several ATM's have bilingual (Spanish) and voice guided capabilities. Other alternate delivery systems are detailed under the Cleveland-Elyria-Mentor MSA.

Community Development Services

NCB's level of CD services is excellent in both the Cleveland-Elyria-Mentor MSA and the Columbus MSA.

In these MSAs, the bank demonstrates a high level of commitment to local community needs by serving well over 100 organizations, and by bank officers and employees devoting 23,000 hours in financial expertise. Sixteen percent of this time includes serving in leadership positions at various not-for-profit organizations that serve the needs of low- and moderate-income individuals.

In the **Cleveland-Elyria-Mentor MSA**, CD services include affordable housing, small business development, and technical support to organizations that serve the educational and social service needs of low-and moderate-income individuals. Bank officers and employees devoted approximately 13,000 hours in financial expertise of which 13 percent was in a leadership role. The following examples highlight CD services in this MSA:

- NCB is a founder and partner in several wealth creation initiatives, including 'Smart Borrower' and Cleveland Saves. These programs were created in conjunction with the Consumer Protection Association, the Spanish American Committee, Consumer Federation of America, and the Consumer Credit Counseling Service to help low- and moderate-income individuals save and build wealth. These services include providing free financial education on using a credit card, buying/leasing an automobile, and purchasing a home. Emphasis is placed on the need to review financial documents before signing.
- NCB conducted a foreclosure prevention seminar to area nonprofit organizations. Approximately 50 representatives from nonprofits organizations that provide credit counseling to low- and moderate-income individuals attended. The program was designed to train organizations on ways to assist their clients who are experiencing mortgage delinquencies.
- Employees and officers provide support to several CD organizations that provide affordable housing in low- and moderate-income neighborhoods and to low- and moderate-income persons. Organizations include The Neighborhood Equity Fund, Local Initiatives Support Group, Cleveland Action to Support Housing, and Stockyard Redevelopment Organization. Employees and officers serve on various organizations' boards of directors and committees, at times in a leadership capacity. Employees and bank officers also provide technical expertise that includes first-time homebuyer education and assistance with loan application processing, including down-payment and closing costs.
- Employees and officers provide support to several other CD organizations that provide various services to low- and moderate-income individuals including job training, healthcare, food and shelter, treatment programs for substance abuse,

and financial literacy, among others. Organizations include St. Philip Neri Partnership Employment Program, Catholic Diocese of Cleveland Foundation, Towards Employment, Metzenbaum Sheltered Industries, East Side Catholic Center & Shelter, Old Stone Foundation, and Harvest for Hunger. Officers and employees serve as board members on a majority of the organizations and also serve in leadership positions as presidents or vice presidents in at least five of these organizations.

- Employees and officers provide support to CD organizations that assist existing small businesses and start-up businesses, including those located in low- and moderate-income areas. Organizations include Elyria Main Street, WECO Micro-enterprise Organization, Kamms Corners Development Corporation, and Kent Micro-loan Committee.

In the **Columbus MSA**, CD services include affordable housing, small business development, activities that revitalize and stabilize low- and moderate-income areas and technical support to organizations that serve the educational and social service needs of low- and moderate-income individuals. Bank officers and employees devoted at least 10,000 hours in financial expertise of which 19 percent was in a leadership role. The following examples highlight CD services in this MSA:

- NCB partnered with the Catholic Latino Services to bring the Mexican Consulate Mobile to Columbus, Ohio. This event provided the Mexican community the opportunity to obtain passports and consulate identification cards. NCB's CRA and Retail Branch Network collaborated to provide information and educate the "un-banked" low- and moderate-income Mexican community on financial products and services. NCB's bilingual retail team helped participants open bank accounts.
- NCB partnered with the Columbus Urban League and participated in its Annual Minority Homeownership Expo. This event provided homeownership training and information to minority residents that are also predominantly low-income. NCB CRA and mortgage departments collaborated to plan this event. In addition, NCB facilitated workshops and provided financial information on its products and services. Over 1,500 residents, primarily low- and moderate-income individuals have attended over a seven-year period.
- Employees and officers provide support to several CD organizations that provide affordable housing in low- and moderate-income neighborhoods and to low- and moderate-income persons. Organizations include the Council for Rural Housing and Development, Community Homes Revitalization Corporation, Ohio Housing Finance Agency, Homes on the Hill CDC, and Columbus Housing Partnership. Bank employees and officers serve on committees and as board members on most of the affordable housing organizations and are in leadership positions in two of these organizations.

- Employees and officers provide support to CD organizations that assist existing and start-up businesses, including those located in low- and moderate-income areas. Organizations include: S.C.O.R.E., Columbus Growth Fund, Neighborhood House Micro-loan Committee, and Ohio Statewide Development Corporation. At least one employee provided leadership as president of one of the organizations. Also, several bank employees and officers served as board members as well.
- Employees and officers provide support to several CD organizations that work to revitalize and stabilize low- and moderate-income areas. Organizations include: Neighborhood Partnership Program, Columbus Compact, Rebuilding Together-Columbus, and Ohio Community Development Finance Fund Investment Committee.
- Employees and officers provide support to and are highly responsive to many CD organizations that offer direct support and social services to low- and moderate-income individuals and families. These organizations provide numerous services including, food and meal distribution, higher education, financial literacy, job skills training, temporary shelter, and other social services. Organizations include The Buckeye Ranch, United Negro College Fund, Columbus Partners in Education, Children's Hunger Alliance, Operation Feed, Center for New Directions, City Year Columbus, United Way, Salvation Army, and Life Care Alliance. Officers and employees serve in leadership positions at three of the organizations in positions such as the president. Employees also serve as on boards and committees of these organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Akron, Dayton, Springfield, Weirton, and Youngstown MSAs is not inconsistent with the bank's overall 'High Satisfactory' performance under the Service Test in Ohio.

In the Cincinnati, Huntington, Sandusky, Wheeling MSAs, and the non-metropolitan areas the bank's performance is stronger than the bank's overall performance in Ohio. The stronger performance is due to a greater bank presence. In the Canton, Mansfield, and Toledo MSAs, the bank's performance is weaker than the bank's overall performance in Ohio. The weaker rating is due to a lower distribution of branches in low- or moderate-income geographies.

Performance in the limited-scope MSAs did not negatively impact the overall Service Test rating for Ohio. Refer to Table 15 in the State of Ohio section of Appendix D for the facts and data that support these conclusions.

State Rating

State of Florida

CRA Rating for Florida: **Satisfactory**
 The lending test is rated: **Low Satisfactory**
 The investment test is rated: **High Satisfactory**
 The Service Test is rated: **Low Satisfactory**

The major factors that support this rating:

- Adequate level of HMDA geographic distribution and good borrower distribution;
- Good level of investments; and
- Adequate level of community development services.

Description of Institution's Operations in Florida

NCB operations in Florida consist of two branch locations. One branch is located in the city of West Palm Beach in the West Palm Beach-Boca Raton-Boynton Beach MSA, and the other branch is located in the city of Naples in the Naples-Marco Island MSA. Refer to the Market Profiles for the state of Florida in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

These branches were established to facilitate trust activities, which remains the primary strategic focus. The branches are chartered as full service entities. However, in these communities, NCB does not obtain deposits from the general public and does not directly extend retail loans. Instead, the bank relies entirely on affiliate activities in this area to fulfill CRA responsibilities. We gave these factors significant consideration during our analysis. In addition, we considered the fact that home mortgage lending activities were negatively impacted by an extremely high percentage of households who rent rather than own housing (>97%) in the West Palm Beach AA's low-income geographies.

Scope of Evaluation in Florida

Of the two Florida AAs, we selected West Palm Beach to receive a full-scope review. Loan volume was significantly higher in the West Palm Beach AA than in the Naples AA. The ratings are primarily based on performance in the West Palm Beach AA. See the table in Appendix A for more information.

When determining conclusions for the Lending Test, we weighted home mortgage loans more heavily than small loans to businesses because of the higher volume of home mortgage loans. There were no small loans to farms originated during the review period.

Within home mortgage lending, we gave additional consideration to home purchase loans because of their higher volume as compared to home improvement and refinance loans. Moderate-income geographies had a higher percentage of owner-occupied housing units than low-income geographies, and therefore, moderate-income geographies were more heavily weighted. Additionally, low-income families represented a higher percentage of the families in the AA, and therefore, low-income families were more heavily weighted.

A meaningful assessment of home improvement loans and small loans to businesses could not be performed due to the nominal volume of loans originated during the review period; therefore, analyses were not performed.

There are three time periods covered in this evaluation. The first time period has the most volume and accounts for three fifths of the entire evaluation period, therefore, it received the most weight. See the Scope of the Evaluation section for additional detail.

When determining conclusions for the Service Test, we weighted community development activities more heavily than retail services because the bank does not offer those types of services to the general public in this area.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Florida is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the West Palm Beach AA is adequate.

Lending Activity

Refer to Table 1 in the State of Florida section of Appendix D for the facts and data used to evaluate the bank's lending activity.

A conclusion on the level of lending activity was not made due to NCB's lack of deposits in this AA. Lending activities were originated by affiliates. There were 850 HMDA loans originated during the evaluation period, including 477 home purchase loans, four home improvement loans, and 369 refinance loans. In addition three small loans to businesses were originated during the evaluation period.

Market share information is reflected in the Lending Tables in Appendix D; however, it is not included in the Lending Test analysis because it is not meaningful given the business strategy of the bank in this AA.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

See Tables 2, 3, and 4 in the State of Florida section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations. Tables are only shown if there is lending activity.

NCB's overall geographic distribution is adequate. The bank's geographic distribution is adequate for home purchase, and it is good for refinance.

Home Purchase

NCB's geographic distribution of home purchase loans is adequate. The bank's distribution of home purchase loans in low-income geographies is good, and in moderate-income geographies is adequate.

During the first time period, the bank's percentage of home purchase loans in low -and moderate-income geographies is less than the percentage of owner-occupied housing units.

During the second time period, the bank's percentage of home purchase loans in low-income geographies exceeds the percentage of owner-occupied housing units. Its percentage of home purchase loans in moderate-income geographies is less than the percentage of owner-occupied housing units.

During the third time period, the bank's percentage of home purchase loans in low-income geographies exceeds the percentage of owner-occupied housing units. Its percentage of home purchase loans in moderate-income geographies is near to the percentage of those geographies.

Refinance

NCB's geographic distribution of refinance loans is good. The bank's distribution of refinance loans in low-income geographies is poor. However, performance in low-income geographies is considered adequate given the bank's strategic focus and limitations in the state of Florida (see the Description of Institution's Operations in Florida for further details). Additionally, the bank's distribution of refinance loans in moderate-income geographies is good.

During the first time period, there were no refinance loans originated in low-income geographies. The bank's percentage of refinance loans in moderate-income geographies is less than the percentage of owner-occupied housing units.

During the second time period, the bank's percentage of refinance loans in low-income geographies is significantly less than the percentage of owner-occupied housing units. Its percentage of refinance loans in moderate-income geographies exceeds the percentage of owner-occupied housing units.

During the third time period, the bank's percentage of refinance loans in low-income geographies is significantly less than the percentage of owner-occupied housing units. Its percentage of refinance loans in moderate-income geographies is near to the percentage of owner-occupied housing units.

Lending Gap Analysis

A Lending Gap analysis was not performed because the bank does not make retail loans and has no control over the distribution of affiliate lending.

Inside/Outside Ratio

The Inside/Outside Ratio was not performed because it is based on loans originated by the bank and does not include affiliate lending. The bank did not originate loans in this state.

Distribution of Loans by Income Level of the Borrower

NCB's overall borrower distribution is good.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the State of Florida section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

NCB's borrower distribution in the West Palm Beach AA is good. The bank's distribution of home purchase loans is good, and refinance loans is adequate.

Home Purchase

NCB's borrower distribution of home purchase loans is good. The bank's distribution of home purchase loans to low-income borrowers is adequate, and to moderate-income borrowers is excellent.

During the first time period, the bank's percentage of home purchase loans to low-income borrowers is less than the percentage of those families in the AA. Its percentage of home purchase loans to moderate-income borrowers exceeds the percentage of those families in the AA.

During the second time period, the bank's percentage of home purchase loans to low-income borrowers is substantially less than the percentage of those families in the AA. Its percentage of home purchase loans to moderate-income borrowers exceeds the percentage of those families in the AA.

During the third time period, the bank's percentage of home purchase loans to low-income borrowers is substantially less than the percentage of those families in the AA. Its percentage of home purchase loans to moderate-income borrowers exceeds the percentage of those families in the AA.

Refinance

NCB's borrower distribution of refinance loans is adequate. The bank's distribution of refinance loans to low-income borrowers is generally poor. However, refinance performance to low-income borrowers is considered adequate given the bank's strategic focus and limitations in the state of Florida (see the Description of Institution's Operations in Florida for further details). Additionally, the bank's distribution of refinance loans to moderate-income borrowers is excellent.

During the first time period, the bank's percentage of refinance loans to low-income borrowers is significantly less than the percentage of those families in the AA. Its percentage of home purchase loans to moderate-income borrowers exceeds the percentage of those families in the AA.

During the second time period, the bank's percentage of refinance loans to low-income borrowers is less than the percentage of those families in the AA. Its percentage of home purchase loans to moderate-income borrowers exceeds the percentage of those families in the AA.

During the third time period, the bank's percentage of refinance loans to low-income borrowers is substantially less than the percentage of those families in the AA. Its percentage of home purchase loans to moderate-income borrowers exceeds the percentage of those families in the AA.

Community Development Lending

There was no community development lending in this AA during this evaluation.

Product Innovation and Flexibility

Innovative and flexible lending products are offered bank-wide, see discussion in the State of Ohio for details.

Conclusions for Areas Receiving Limited-Scope Reviews

In the Naples AA, the bank's performance is not inconsistent with the bank's overall "Low Satisfactory" performance under the Lending Test in Florida. Refer to Tables 1 through 11 in the State of Florida section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in Florida is rated "High Satisfactory." Based on a full-scope review, performance in the West Palm Beach AA is adequate. However, performance in the limited-scope AA positively impacted the Investment Test rating for Florida.

Refer to Table 14 in the State of Florida section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The volume of investments in the West Palm Beach AA is adequate based on the bank's strategic focus and limitations in the state of Florida (see the Description of Institution's Operations in Florida for further details). Investment opportunities in the AA are considered moderate and competition for such investments is also moderate. Refer to the AA Market Profile in Appendix C for details of identified opportunities and needs in the AA. Affiliate investments in this AA were comprised of two investments totaling \$4 thousand. These investments consisted of donations to one charitable foundation that provides services to low- and moderate-income persons. These are considered routine investments with no complexity.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Naples AA is stronger than the bank's overall 'High Satisfactory' performance under the Investment Test in Florida. The stronger performance is due to a substantial \$1.5 million investment in a corporation that offers CRA preferred shares that finance affordable housing units for low- and moderate-income persons that provided a

significant number of affordable housing units. Performance in the limited-scope AA significantly impacted the Investment Test rating for Florida. Refer to Table 14 in the State of Florida section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Florida is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the West Palm Beach AA is adequate.

NCB's community development services were the prime indicator of the bank's performance under the Service Test due to the bank's lack of retail banking services.

Retail Banking Services

Refer to Table 15 in the State of Florida section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

However, an analysis of Retail Banking Services was not performed because the bank's two branch locations in Florida do not offer retail services to the general public or accept deposits from the general public (see the Description of Institution's Operations in Florida for further details).

Community Development Services

The bank's level of community development services is adequate. The responsiveness of the services to the needs of the community afforded by the bank is adequate considering the bank's limited staffing and its primary strategic focus of servicing trust clients. The bank provided banking related services (fundraising) to two community organizations with a CD purpose that included free legal services and economic development.

Conclusions for Areas Receiving Limited-Scope Reviews

In the Naples AA, the bank's performance is not inconsistent with the state's overall "Low Satisfactory" performance under the Service Test in Florida. Refer to Table 15 in the State of Florida section of Appendix D for the facts and data that support these conclusions.

State Rating

State of Illinois

CRA Rating for Illinois:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating:

- Good level of HMDA geographic distribution and adequate level of HMDA borrower distribution;
- Good levels of small loans to businesses geographic distribution and borrower distribution;
- Excellent level of investments; and
- Good level of community development services.

Description of Institution's Operations in Illinois

NCB has one branch location in Illinois. The branch is located in the city of Chicago in the Chicago-Naperville-Joliet MSA. Refer to the Market Profiles for the State of Illinois in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

The bank does not have retail deposits in this state. However, an affiliate (NCB of the Midwest) has a significant presence in this State. NCB of the Midwest is the seventh largest deposit taker with a 2.14% market share. J P Morgan Chase Bank, N.A., LaSalle Bank, N.A., and Harris, N.A. dominate the market with 13%, 10%, and 7% of the deposit market share, respectively.

The branch was established for commercial lending activities, and that remains the primary strategic focus. The branch is chartered as a full service entity. However, within this community, NCB does not obtain deposits from the general public and does not directly extend retail loans. Instead, the bank relies entirely on affiliate activities in this area to fulfill CRA responsibilities. We gave these factors significant consideration during our analysis. In addition, we considered the fact that home mortgage lending activities were negatively impacted by high housing costs in the area, and the existence of extremely high rental occupancy rates (>99%) in the AA's low and moderate-income geographies. We also noted that there is an extremely low percentage (less than ½ %) of businesses located in low-income geographies.

Scope of Evaluation in Illinois

The bank's single AA in Chicago, was selected to receive a full-scope review. See the table in Appendix A for more information.

When determining conclusions for the Lending Test, we weighted home mortgage loans more heavily than small loans to businesses because of the higher volume of home mortgage loans. There were no small loans to farms originated during the review period.

Within home mortgage lending, we gave additional consideration to home purchases because of their higher volume as compared to home improvement and refinance loans, and because home purchase was identified as a credit need in the local community. Low-income families represented a higher percentage of the families in the AA, therefore, low-income families were more heavily weighted. Additionally, the percentage of businesses in moderate-income geographies was higher than in low-income geographies. Therefore, businesses in moderate-income geographies were more heavily weighted.

Home improvement loan volume was nominal, therefore, an analysis was not deemed meaningful.

There are three time periods covered in this evaluation. The first time period has the most volume and accounts for three fifths of the entire evaluation period, therefore, it received the most weight (see the Scope of the Evaluation section for additional detail).

When determining conclusions for the Service Test, we weighted community development activities more heavily than retail services because the bank does not offer those services to the general public in this area.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Illinois is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Chicago AA is adequate.

Lending Activity

Refer to Table 1 in the State of Illinois section of Appendix D for the facts and data used to evaluate the bank's lending activity.

A conclusion on the level of lending activity was not made due to NCB's lack of deposits in this AA. Lending activities were originated by affiliates. Affiliate's originated 783

HMDA loans during the evaluation period, including 393 home purchase loans, two home improvement loans, and 388 refinance loans. In addition, affiliates originated 168 small loans to businesses during the evaluation period.

Market share information is reflected in the Lending Tables in Appendix D; however, it is not included in the Lending Test analysis because it is not meaningful considering the business strategy of the bank in this AA.

Distribution of Loans by Income Level of the Geography

NCB's overall geographic distribution is good.

Home Mortgage Loans

See Tables 2, 3, and 4 in the State of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.

NCB's geographic distribution of home mortgage loans is good. The bank's distribution of home purchase loans is good, and refinance loans is adequate.

Home Purchase

NCB's geographic distribution of home purchase loans is good. The bank's distribution of home purchase loans in low-income geographies is excellent, and in moderate-income geographies is adequate.

During the first time period, the bank's percentage of home purchase loans in low-and moderate-income geographies exceeds the percentage of owner-occupied housing units.

During the second and third time periods, the bank's percentages of home purchase loans originated in low-income geographies exceed the percentage of owner-occupied housing units. The bank did not originate any home purchase loans in moderate-income geographies.

Refinance

NCB's geographic distribution of refinance loans is adequate. The bank's distribution of refinance loans in low-income geographies is adequate and in moderate-income geographies is good.

During the first time period, the bank's percentage of refinance loans in low- and moderate-income geographies exceeds the percentage of owner-occupied housing units.

During the second time period, the bank did not originate any refinance loans in low-income geographies. The bank's percentage of refinance loans in moderate-income geographies exceeds the percentage of owner-occupied housing units.

During the third time period, the bank did not originate any refinance loans in low- or moderate-income geographies.

Small Loans to Businesses

Refer to Table 6 in the State of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination of small loans to businesses.

NCB's geographic distribution of small loans to businesses is good. The bank's distribution of small loans to businesses in low-income geographies is adequate (see the Description of Institution's Operations in Illinois for further details). The distribution of small loans to businesses in moderate-income geographies is excellent.

During the first time period, the bank's percentage of small loans to businesses in both the low- and moderate-income geographies exceeds the percentage of those businesses.

During the second time period, there were no small loans to businesses originated in low-income geographies. The bank's percentage of small loans to businesses originated in moderate-income geographies exceeds the percentage of those businesses.

During the third time period, there were no small loans to businesses originated in low-income geographies. The bank's percentage of small loans to businesses originated in moderate-income geographies is less than the percentage of those businesses.

Lending Gap Analysis

A Lending Gap analysis was not performed because the bank does not make retail loans and has no control over the distribution of affiliate lending.

Inside/Outside Ratio

The Inside/Outside Ratio was not performed because it is based on loans originated by the bank and does not include affiliate lending. The bank did not originate loans in this state.

Distribution of Loans by Income Level of the Borrower

NCB's overall borrower distribution is adequate.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the State of Illinois section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

NCB's borrower distribution of home mortgage loans is adequate. All HMDA lending is adequate.

Home Purchase

NCB's borrower distribution of home purchase loans is adequate. Home purchase borrower distribution to low-income borrowers is very poor. However, performance to low-income borrowers is considered adequate given the bank's strategic focus and limitations in the state of Illinois (see the Description of Institution's Operations in Illinois for further details). Additionally, home purchase borrower distribution to moderate-income borrowers is excellent.

During the first time period, the percentage of home purchase loans made to low-income borrowers is substantially less than the percentage of those families in the AA. The percentage of home purchase loans made to moderate-income borrowers exceeds the percentage of those families in the AA.

During the second time period, the percentage of home purchase loans made to low-income borrowers is substantially less than the percentage of those families in the AA. The percentage of home purchase loans made to moderate-income borrowers exceeds the percentage of those families in the AA.

During the third time period, the percentage of home purchase loans made to low-income borrowers is substantially less than the percentage of those families in the AA. The percentage of home purchase loans made to moderate-income borrowers is less than the percentage of those families in the AA.

Refinance

NCB's borrower distribution of refinance loans is adequate. Refinance borrower distribution to low-income borrowers is very poor. However, performance to low-income borrowers is considered adequate given the bank's strategic focus and limitations in the state of Illinois (see the Description of Institution's Operations in Illinois for further details). Additionally, refinance borrower distribution to moderate-income borrowers is good.

During the first time period, the bank's percentage of refinance loans made to low-income borrowers is substantially less than the percentage of those families in the AA. The bank's percentage of refinance loans made to moderate-income borrowers is near to the percentage of those families in the AA.

During the second time period, the bank's percentage of refinance loans made to low-income borrowers is substantially less than the percentage of those families in the AA. Its percentage of refinance loans made to moderate-income borrowers is less than the percentage of those families in the AA.

During the third time period, the bank did not originate refinance loans to low-income borrowers in this AA. Its percentage of refinance loans made to moderate-income borrowers exceeds the percentage of those families in the AA.

Small Loans to Businesses

Refer to Table 11 in the State of Illinois section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to businesses.

NCB's borrower distribution of small loans to businesses is good.

During the first time period, the bank's percentage of small loans to businesses with revenues of less than \$1 million is less than the percentage of those businesses. The bank made a majority of loans in amounts less than \$100 thousand.

During the second and third time periods, the bank's percentages of small loans to businesses with revenues less than \$1 million exceed the percentage of those businesses. The bank made a majority of loans in amounts less than \$100 thousand.

Community Development Lending

Refer to Table 1 in the State of Illinois section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

Community development (CD) lending had a positive impact on lending performance in this AA.

CD lending activity consists of one loan totaling \$3 million to the Chicago Equity Fund (CEF). CEF has been the most active syndicator of low-income housing tax credits in the city. As a syndicator, the organization raises money from investors taking advantage of tax credits provided to low-income housing projects. The fund then invests the money as a limited partner in apartment buildings, often in deteriorating neighborhoods on the city's west and south sides.

Product Innovation and Flexibility

Innovative and flexible lending products are offered bank-wide (see discussion in the State of Ohio section for details).

INVESTMENT TEST

The bank's performance under the Investment Test in Illinois is rated "Outstanding." Based on a full-scope review, performance in the Chicago AA is excellent.

Refer to Table 14 in the State of Illinois section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

Investment Test performance in the Chicago AA is excellent. The volume of investments is considered significant given the bank's limited presence and lack of deposits in the AA (see the Description of Institution's Operations in Illinois for further details). Investment opportunities in the AA are ample; however, competition for such investments is high. Refer to the AA Market Profile in Appendix C for details of identified opportunities and needs in the AA. Investments in this AA consisted of 136 qualifying community development investments totaling \$3.6 million made by affiliates. The types of investments are primarily new market tax credits and venture capital funds for small businesses and regional and statewide tax credits, and other funds for affordable housing. These investments contain some complexity and meet the primary identified community development need for affordable housing (see comments under the state of Ohio Investment Test for additional details on complexity).

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Illinois is rated "High Satisfactory." Based on a full-scope review, performance in the Chicago AA is good.

NCB's community development services were the prime indicator of the bank's performance under the Service Test due to the bank's lack of retail banking services.

Retail Banking Services

Refer to Table 15 in the State of Illinois section of Appendix D for facts and data of the bank's branch delivery system and branch openings and closings.

However, an analysis of Retail Banking Services was not performed because the bank's branch in Illinois does not offer retail services to the general public or accept deposits from the general public (see the Description of Institution's Operations in Illinois for further details).

Community Development Services

Affiliates provided a relatively high level of CD services. The responsiveness of its services to the needs of the community is good. Financial expertise was provided to many, at least 24, active community organizations with a CD purpose. These CD organizations provide for the needs of low- and moderate-income individuals, including housing, children services, and social services. Organizations included several CD corporations that focus on economic development. The CD services provided were primarily in a fundraising capacity.

State Rating

State of Michigan

CRA Rating for Michigan: **Satisfactory**
 The lending test is rated: **Low Satisfactory**
 The investment test is rated: **Outstanding**
 The Service Test is rated: **High Satisfactory**

The major factors that support this rating include:

- Adequate lending volume;
- Adequate level of HMDA and small loans to businesses borrower distribution;
- Excellent level of investments; and
- Good level of community development services

Description of Institution's Operations in Michigan

NCB has one branch location in Michigan. The branch is located in the city of Birmingham in the Warren-Farmington Hills-Troy MSA. Refer to the Market Profiles for the State of Michigan in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

The bank does not have retail deposits in this state. However, an NCB affiliate (NCB of the Midwest) has a significant presence in this State. NCB of the Midwest is the fifth largest deposit taker with a 7.12% market share. Standard Federal Bank, NA, Comerica Bank, and J P Morgan Chase Bank, N.A. dominate the market with 14%, 13%, and 12% of the deposit market share, respectively

The Michigan branch was established for commercial lending activities, and that remains its primary strategic focus. The branch is chartered as a full service entity. However, within this community NCB does not obtain deposits from the general public and does not directly extend retail loans. Instead, the bank relies entirely on affiliate activities in this area to fulfill CRA responsibilities. We gave these factors significant consideration during our analysis. In addition, we considered the fact that home mortgage lending activities were negatively impacted by the shortage of affordable housing stock, and the fact that there were no low- or moderate-income geographies in the AA.

Scope of Evaluation in Michigan

The bank's single AA in Birmingham was selected to receive a full-scope review. See the table in Appendix A for more information.

When determining conclusions for the Lending Test, we weighted home mortgage loans more heavily than small loans to businesses because of the higher volume of home mortgage loans. There were no small loans to farms originated during the review period.

Within home mortgage lending, we gave slightly greater consideration to refinance loans because of their higher volume as compared to home purchase and home improvement.

Home improvement loan volume was nominal, therefore, an analysis was not deemed meaningful.

There are three time periods covered in this evaluation. The first time period has the most volume and accounts for three fifths of the entire evaluation period, therefore, it received the most weight (see the Scope of the Evaluation section for further details).

When determining conclusions for the Service Test, we weighted community development activities more heavily than retail services because the bank does not offer those services to the general public in this area.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test performance in Michigan is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Birmingham AA is adequate.

Lending Activity

Refer to Table 1 in the State of Michigan section of Appendix D for the facts and data used to evaluate the bank's lending activity.

A conclusion on the level of lending activity was not made due to NCB's lack of deposits in this AA. Lending activities were originated by affiliates. Affiliate's originated 585 HMDA loans during the evaluation period, including 191 home purchase loans, eight home improvement loans, and 386 refinance loans. In addition, affiliate's originated 207 small loans to businesses during the evaluation period.

Market share information is reflected in the Lending Tables in Appendix D, however, it is not included in the Lending Test analysis because it is not meaningful considering the business strategy of the bank in this AA.

Distribution of Loans by Income Level of the Geography

An analysis of the Distribution of HMDA and Small Loans to Businesses by Income Level of the Geography was not considered meaningful given that there were no low- or moderate-income geographies in the AA.

Lending Gap Analysis

A Lending Gap analysis was not performed (see comments noted above in the Distribution of Loans by Income Level of the Geography).

Inside/Outside Ratio

The Inside/Outside Ratio was not performed because it is based on loans originated by the bank and does not include affiliate lending. The bank did not originate loans in this state.

Distribution of Loans by Income Level of the Borrower

NCB's overall borrower distribution is adequate. The bank's distribution of both HMDA and small loans to businesses is adequate.

Home Mortgage Loans

Refer to Tables 7, 8, and 9 in the State of Michigan section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

NCB's overall borrower distribution of HMDA loans is adequate. The bank's distribution of home purchase loans is good, and refinance loans is poor.

Home Purchases

NCB's borrower distribution of home purchase loans is good. The bank's distribution of home purchase loans to low-income borrowers is poor. However, performance to low-income borrowers is considered adequate given the bank's strategic focus and limitations in the state of Michigan (see the Description of Institution's Operations in

Michigan for further details). Additionally, the bank's distribution of home purchase loans to moderate-income borrowers is excellent.

During the first time period, the bank's percentage of home purchase loans to low-income borrowers is significantly less than the percentage of those families in the AA. Its percentage of home purchase loans to moderate-income borrowers exceeds the percentage of those families in the AA.

During the second and third time periods, no home purchase loans were made to low-income borrowers. The bank's percentage of home purchase loans made to moderate-income borrowers exceeds the percentage of those families in the AA.

Refinance

NCB's borrower distribution of refinance loans is poor. The bank's distribution of refinance loans to low-income borrowers is very poor and to moderate-income borrowers is poor. However, consideration is given to the impact of the bank's strategic focus and limitations in the state of Michigan (see the Description of Institution's Operations in Michigan for further details).

During the first time period, the bank's percentage of refinance loans made to both the low- and moderate-income borrowers is substantially less than the percentage of those families in the AA.

During the second time period, the bank did not make any refinance loans to low-income borrowers. The bank's percentage of refinance loans made to moderate-income borrowers is substantially less than the percentage of those families in the AA.

During the third time period, the bank did not make any refinance loans to low-income borrowers. The bank's percentage of refinance lending to moderate-income borrowers is less than the percentage of those families in the AA.

Small Loans to Businesses

Refer to Table 11 in the State of Michigan section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to businesses.

NCB's borrower distribution of small loans to businesses is adequate.

During all time periods, the bank's percentages of small loans to businesses with revenues less than \$1 million are less than the percentages of those businesses. The bank made a majority of loans in amounts less than \$100 thousand.

Community Development Lending

There was no community development lending in this AA during this evaluation.

Product Innovation and Flexibility

Innovative and flexible lending products are offered bank-wide, see discussion in the State of Ohio for details.

INVESTMENT TEST

The bank's performance under the Investment Test in Michigan is rated "Outstanding." Based on a full-scope review, performance in the Birmingham AA is excellent.

Refer to Table 14 in the State of Michigan section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

Investment Test performance in the Birmingham AA is excellent. The volume of investments is considered significant given the bank's limited presence and lack of deposits in the AA (see the Description of Institution's Operations in Michigan for further details). Investment opportunities in the AA are ample; however, competition for such investments is high. Refer to the AA Market Profile in Appendix C for details of identified opportunities and needs in the AA. Investments in this AA consisted of 139 qualifying community development investments totaling \$6.5 million made by affiliates. The investments consist of statewide direct equity and tax credits for affordable housing. These investments contain some complexity; particularly direct equity investments contain a high level of complexity. See comment under the state of Ohio Investment Test for additional details on direct equity complexity.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Michigan is rated "High Satisfactory." Based on a full-scope review, performance in the Birmingham AA is good.

NCB's community development services were the prime indicator of the bank's performance under the Service Test due to the bank's lack of retail banking services.

Retail Banking Services

Refer to Table 15 in the State of Michigan section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

However, an analysis of Retail Banking Services was not performed because the bank's branch in Michigan does not offer retail services to the general public or accept deposits from the general public (see the Description of Institution's Operations in Michigan for further details).

Community Development Services

Affiliates provided a relatively high level of community development services. The responsiveness of its services to the needs of the community is good. Financial expertise was provided to the majority, eight of ten, of the organizations in the AA with a CD purpose. These organizations serviced various needs of low- and moderate-income individuals, including housing, child care, and social services. The CD services provided included serving as board members, committee members, and volunteers.

State Rating

State of Pennsylvania

CRA Rating for Pennsylvania: **Satisfactory**
 The lending test is rated: **Low Satisfactory**
 The investment test is rated: **Low Satisfactory**
 The Service Test is rated: **Low Satisfactory**

The major factors that support this rating include:

- Adequate lending activity;
- Poor level of HMDA geographic distribution and adequate level of HMDA borrower distribution;
- Positive impact of community development lending supports the overall Lending Test performance;
- Adequate level of investments; and
- Adequate level of community development services.

Description of Institution's Operations in Pennsylvania

NCB has one branch location in the state. The branch is located in the city of Philadelphia in the Philadelphia MSA. Refer to the Market Profiles for the state of Pennsylvania in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

The bank does not have retail deposits in this state. However, NCB affiliate National City Bank of Pennsylvania has a significant presence in this state. The Pennsylvania affiliate is the fourth largest deposit taker with a 5.20% market share. PNC Bank, N.A., Wachovia Bank, N.A., and Citizens Bank of PA dominate the market with 14%, 12%, and 11% of the deposit market share, respectively. NCB has defined a portion of Philadelphia County in the Philadelphia metropolitan division as its AA.

The branch was established for middle-market commercial lending activities, which remains the primary strategic focus. The branch is chartered as a full service entity. However, in these communities, NCB does not obtain deposits from the general public and does not directly extend retail loans. Instead the bank relies entirely on affiliate activities in this area to fulfill CRA responsibilities. In addition, we considered the fact that home mortgage lending activities were negatively impacted by extremely high rental occupancy rates (>98%) in the AA's low-income geographies.

Scope of Evaluation in Pennsylvania

The bank's single AA in Philadelphia was selected to receive a full-scope review. See the table in Appendix A for more information.

When determining conclusions for the Lending Test, within home mortgage lending, we gave equal consideration to home purchases and refinance because of similar volume. When determining conclusions for home mortgages we gave greater consideration to borrower distribution given that in the geographic distribution, there are a low number of low- and moderate-income geographies. Additionally, moderate-income families represented a higher percentage of the families in the AA; therefore, moderate-income families were more heavily weighted.

A meaningful assessment of home improvement loans and small loans to businesses could not be performed due to the nominal volume of loans originated during the review period; therefore, analyses were not performed.

There are three time periods covered in this evaluation. The first time period has the most volume and accounts for three fifths of the entire evaluation period, therefore, it received the most weight. See the Scope of the Evaluation section for additional detail.

When determining conclusions for the Service Test, we weighted community development activities more heavily than retail services because the bank does not offer those services to the general public in this area.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Pennsylvania is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Philadelphia AA is adequate.

Lending Activity

Refer to Table 1 in the State of Pennsylvania section of Appendix D for facts and data used to evaluate the bank's lending activity.

A conclusion on the level of lending activity was not made due to NCB's lack of deposits in this AA. Lending activities were originated by affiliates. Affiliates originated 177 HMDA loans during the evaluation period, including 83 home purchase loans, seven home improvement loans, and 87 refinance loans. In addition, affiliates originated 12 small loans to businesses during the evaluation period.

Market share information is reflected in the Lending Tables in Appendix D; however, it was not included in the Lending Test analysis because it is not meaningful considering the business strategy of the bank in this AA.

Distribution of Loans by Income Level of the Geography

NCB's overall geographic distribution is poor.

Home Mortgage Loans

See Tables 2, 3, and 4 in the State of Pennsylvania section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.

NCB's geographic distribution of home mortgage loans is poor. The bank's distribution of home purchase loans and refinance loans is poor.

Home Purchase

NCB's geographic distribution of home purchase loans is poor. The bank's distribution of home purchase loans in low-income geographies is adequate. The bank's distribution of home purchase loans in moderate-income geographies is very poor. However, consideration is given to the impact of the bank's strategic focus and limitations in the state of Pennsylvania (see the Description of Institution's Operations in Pennsylvania for further details).

During the first time period, there were no home purchase loans originated in low-income geographies. There were no moderate-income geographies in this AA during this time period.

During the second time period, the bank's percentage of home purchase lending in low-income geographies exceeds the percentage of owner-occupied housing units. Its percentage of home purchase lending in moderate-income geographies is substantially less than the percentage of owner-occupied housing units.

During the third time period, the bank's percentage of home purchase lending in low-income geographies exceeds the percentage of owner-occupied housing units. No home purchase loans were originated in moderate-income geographies.

Refinance

NCB's geographic distribution of refinance loans is poor. The bank's distribution of refinance loans in both the low- and moderate-income geographies is very poor. However, consideration is given to the impact of the bank's strategic focus and

limitations in the state of Pennsylvania (see the Description of Institution's Operations in Pennsylvania for further details).

During the first time period, no refinance loans were made in low-income geographies. There were no moderate-income geographies in this AA during this time period.

During the second time period, no refinance loans were made in low- or moderate-income geographies.

During the third time period, no refinance loans were made in low-income geographies. The bank's percentage of refinance loans in moderate-income geographies is less than the percentage of those geographies.

Lending Gap Analysis

A Lending Gap analysis was not performed because the bank does not make retail loans and has no control over the distribution of affiliate lending.

Inside/Outside Ratio

The Inside/Outside Ratio was not performed because it is based on loans originated by the bank and does not include affiliate lending. The bank did not originate loans in this state.

Distribution of Loans by Income Level of the Borrower

NCB's overall borrower distribution is adequate.

Home Mortgage Loans

Refer to Tables 7, 8, and 9 in the State of Pennsylvania section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

NCB's borrower distribution of home mortgage loans is adequate. The bank distribution of home purchase loans and refinance loans is adequate.

Home Purchase

NCB's borrower distribution of home purchase loans is good. The bank's distribution of home purchase loans to low-income borrowers is very poor. However, performance to low-income borrowers is considered adequate given the bank's strategic focus and limitations in the state of Pennsylvania (see the Description of Institution's Operations in Pennsylvania for further details). Additionally, the bank's distribution of home purchase loans to moderate-income borrowers is good.

During the first time period, the bank's percentage of home purchase loans made to low-income borrowers is substantially less than the percentage of those families in the AA. The bank's percentage of home purchase loans made to moderate-income borrowers exceeds the percentage of those families in the AA.

During the second time period, the bank did not make any home purchase loans to low-income borrowers. The bank's percentage of home purchase loans made to moderate-income borrowers exceeds the percentage of those families in the AA.

During the third time period, the bank's percentage of home purchase loans made to low-income borrowers is less than the percentage of those families in the AA. The bank did not make any home purchase loans to moderate-income borrowers.

Refinance

NCB's borrower distribution of refinance loans is adequate. The bank's distribution of refinance loans to low-income borrowers is very poor. However, performance to low-income borrowers is considered adequate given the bank's strategic focus and limitations in the state of Pennsylvania (see the Description of Institution's Operations in Pennsylvania for further details). Additionally, the bank's distribution of refinance loans to moderate-income borrowers is adequate.

During the first time period, the bank's percentage of refinance loans made to low-income borrowers is substantially less than the percentage of those families in the AA. The bank's percentage of home purchase loans made to moderate-income borrowers is significantly less than the percentage of those families in the AA.

During the second time period, the bank's percentage of refinance loans made to low-income borrowers is substantially less than the percentage of those families in the AA. Its percentage of refinance loans made to moderate-income borrowers exceeds the percentage of those families in the AA.

During the third time period, the bank did not make any refinance loans to low-income borrowers. The bank's percentage of refinance loans made to moderate-income borrowers exceeds the percentage of those families in the AA.

Community Development Lending

Refer to Table 1 in the State of Pennsylvania Appendix D for the facts and data used to evaluate the bank's level of community development lending.

Community development lending has a positive impact on the lending performance in this AA. An affiliate made three loans totaling \$45 thousand to a Community Development Bank. This bank is located in a depressed urban area. The purpose of the entity includes investing in low cost housing projects and in technical assistance programs that help revitalize neighborhoods and strengthen local small businesses.

Product Innovation and Flexibility

Innovative and flexible lending products are offered bank-wide, see discussion in the State of Ohio for details.

INVESTMENT TEST

The bank's performance under the Investment Test in Pennsylvania is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Philadelphia AA is adequate.

Refer to Table 14 in the State of Pennsylvania section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

The volume of investments in the Philadelphia AA is adequate. The volume of investments is considered adequate given the bank's limited presence and lack of deposits in the AA (see Description of Institution's Operations in Michigan for further details). Investment opportunities in the AA are ample and competition for such investments is high. Refer to the AA Market Profile in Appendix C for details of identified opportunities and needs in the AA. Affiliate investments in this AA consist of nine investments for \$35 thousand. These investments consist of donations to organizations that provide various types of community development services to low- and moderate-income persons, including housing services, social services, and revitalization efforts in low- and moderate-income geographies. These types of investments are considered routine and noncomplex.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Pennsylvania is rated "Low Satisfactory." Based on a full-scope review, performance in the Philadelphia AA is adequate.

NCB's community development services were the prime indicator of the bank's performance under the Service Test due to the bank's lack of retail banking services.

Retail Banking Services

Refer to Table 15 in the state of Pennsylvania section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

However, an analysis of Retail Banking Services was not performed because the bank's branch in Pennsylvania does not offer retail services to the general public or accept deposits from the general public (see the Description of Institution's Operations in Pennsylvania for additional detail).

Community Development Services

The bank provided an adequate level of community development services. The responsiveness of the services to the needs of the community afforded by the bank is adequate considering the bank's limited staffing and its primary strategic focus. The bank participated in fundraising activities with one educational entity providing services to low- and moderate-income individuals.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (includes CD Loans): 10/01/99 to 12/31/02 01/01/03 to 12/31/04 01/01/04 to 12/31/04 Investment: 02/23/00 to 06/30/05 Service Tests : 02/23/00 to 06/30/05	
Financial Institution		Products Reviewed
National City Bank (NCB) Cleveland, OH		Home purchase, home-improvement, and home refinance loans, small-business/farm loans, community development loans, community development investments, and community development services.
Affiliate	Affiliate Relationship	Products Reviewed
National City Bank of Pennsylvania	Holding corporation subsidiary	Home purchase, home-improvement, and home refinance loans.
National City Bank of Indiana	Holding corporation subsidiary	Home purchase, home-improvement, and home refinance loans.
National City Mortgage Corporation	National City Bank of Indiana subsidiary	Home purchase, home-improvement, and home refinance loans.
National City Bank of Michigan/Illinois	Holding corporation subsidiary	Home purchase, home-improvement, and home refinance loans.
National City Mortgage Service	National City Bank of Michigan/Illinois subsidiary	Home purchase, home-improvement, and home refinance loans.
National City Bank of Kentucky	Holding corporation subsidiary	Home purchase, home-improvement, and home refinance loans.
National City Bank of Southern Indiana	Holding corporation subsidiary	Home purchase, home-improvement, and home refinance loans.
First Franklin Financial Corporation	National City Bank of Indiana	Home purchase, home-improvement, and home refinance

	subsidiary	loans.
National City Community Development Corporation	Holding corporation subsidiary	Community development loans, community development investments, community development services.
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Cleveland-Elyria-Mentor #17460	Full-Scope	MSA
Columbus #18140	Full-Scope	MSA
Akron #10420	Limited-Scope	MSA
Canton-Massillon #15940	Limited-Scope	MSA
Cincinnati-Middletown #17140	Limited-Scope	MSA
Dayton #19380	Limited-Scope	MSA
Huntington-Ashland #26580	Limited-Scope	MSA
Mansfield #31900	Limited-Scope	MSA
Sandusky #41780	Limited-Scope	MSA
Springfield #44220	Limited-Scope	MSA
Toledo #45780	Limited-Scope	MSA
Weirton-Steubenville #48260	Limited-Scope	MSA
Wheeling #48540	Limited-Scope	MSA
Youngstown-Warren-Boardman #49660	Limited-Scope	MSA
Ashland, Clinton, Columbiana, Coshocton, Fayette, Guernsey, Harrison, Henry, Hocking, Holmes, Huron, Jackson, Knox, Logan, Marion, Muskingum, Perry, Ross, Sandusky, Scioto, Sandusky, Scioto, Seneca, Shelby, Tuscarawas, Wayne, and Williams Counties	Limited-Scope	Non-MSAs
West Palm Beach #48424	Full-Scope	MSA
Naples #34940	Limited-Scope	MSA
Chicago #16974	Full-Scope	MSA
Birmingham #47644	Full-Scope	MSA
Philadelphia #37964	Full-Scope	MSA

Appendix B: Summary of State Ratings

RATINGS		NATIONAL CITY BANK		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
National City Bank	Outstanding	Outstanding	High Satisfactory	Outstanding
State:				
Ohio	Outstanding	Outstanding	High Satisfactory	Outstanding
Florida	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Illinois	Low Satisfactory	Outstanding	High Satisfactory	Satisfactory
Michigan	Low Satisfactory	Outstanding	High Satisfactory	Satisfactory
Pennsylvania	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Cleveland-Elyria-Mentor MSA	C-2
Columbus MSA.....	C-5
West Palm Beach AA	C-8
Chicago AA.....	C-10
Birmingham AA.....	C-12
Philadelphia AA	C-14

State of Ohio Full-Scope Areas

Cleveland-Elyria-Mentor MSA

Demographic Information for Full Scope Area: Cleveland-Elyria-Mentor MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	693	16.02	20.06	38.82	23.81	1.30
Population by Geography	2,148,143	9.74	16.77	43.79	29.67	0.03
Owner-Occupied Housing by Geography	580,878	4.83	12.41	48.22	34.54	0.00
Business by Geography	115,485	7.51	14.64	40.90	36.13	0.82
Farms by Geography	3,011	1.73	5.75	50.81	41.58	0.13
Family Distribution by Income Level	562,913	20.34	18.08	22.21	39.37	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	216,274	17.82	24.67	41.67	15.84	0.00
Median Family Income HUD Adjusted Median Family Income for 2004 Households Below Poverty Level		52,660 58,300 10.58%	Median Housing Value Unemployment Rate (2000 US Census)		121,274 2.62%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2004 HUD updated MFI

This AA consists of the entire Cleveland-Elyria-Mentor MSA (i.e. Cuyahoga, Geauga, Lake, Lorain, and Medina Counties) that is located in northeast Ohio. (The MSA name changed from Cleveland-Lorain-Elyria during the evaluation period). The bank has not arbitrarily excluded low- or moderate-income geographies. NCB has 24 percent of its branches and 23 percent of its ATMs located within the AA. This MSA is the largest MSA in the state. Over the evaluation period, NCB had 22 percent of home mortgage loans, and 26 percent of small loans to businesses derived from this AA. The bank's primary business focus in the AA is traditional retail banking products.

NCB's deposits in this AA total \$20 billion. This represents 68 percent of the bank's total deposits based on FDIC deposit market share data as of June 30, 2005. NCB is the lead deposit taking institution in the AA with a 32 percent market share. Major competitors include Key Bank, N.A., Charter One Bank, N.A., and Third Federal Savings and Loan of Cleveland.

Cleveland has experienced significant decline in population and in the metropolitan area and has lost of one-sixth of its population between 1980 and 2000. Effects of

population loss in the central city and in the older, inner-ring suburbs are evident by the physical decline of the neighborhoods with vacant and deteriorated residential and commercial buildings.

The city of Cleveland has experienced a decline in jobs. Less than one-third of the region's workers are employed in the city. The major industries are education, health, social services, and manufacturing. Major employers include Case Western Reserve University, Cleveland Clinic, American Greeting Corp., Ford Motor Co., and General Motors Co.

The unemployment rate has risen in the AA from 3.4 percent at year-end 2000, to 6.3 percent as of June 30, 2005. The state of Ohio's and the national unemployment rate were 6.2 percent and 5.0 percent, respectively. Lorain County and Geauga County had the highest and lowest unemployment rates within the AA of 6.7 percent and 4.9 percent, respectively. Almost eleven percent of families live below the poverty level based on 2000 Census Data. A substantial majority of the poverty is concentrated in the city of Cleveland, particularly on the east side.

The 2004 HUD adjusted median family income for the AA is \$58,300. Twenty percent and 18 percent of families are low-income and moderate-income, respectively based on 2000 Census Data. The 2000 median housing value for the AA is \$121,274. This represents a 67 percent increase in the price of a home (\$72,437) from 1990 Census Data.

We determined the community's credit needs by contacting representatives from local housing and community service agencies and small business development organizations. The OCC's Central District Community Affairs Officers also provided information on credit needs.

We identified the following credit and non-credit related needs in this AA:

- Affordable housing (i.e. single family rental, multifamily rental, homeownership, and rehabilitation) for low- and moderate-income individuals. Public and rental assisted housing and down payment assistance were also identified needs.
- Small business working capital loans to existing and start-up businesses in amounts of \$100,000 and less. Technical assistance to new and existing small businesses was also identified as a need.
- Social services to low- and moderate-income families, including childcare services, job training and counseling, credit and home ownership counseling, food donation, and health care services.
- We determined that the opportunity to make CD loans and qualified investments and to provide CD services within the AA is high. The Cleveland MSA is home to a large number of sophisticated community-based organizations that are engaged in a wide range of activities from industrial retention and development to housing rehabilitation and new affordable housing construction. There has been considerable investment and some development in selected areas within the city of Cleveland. Most neighborhoods are served by a nonprofit CDC that engages

in housing, commercial real estate, and small business development. Although they vary individually, these CDC's, collectively, are among the most competent and accomplished in the U.S. Competition for CD loans, qualified investments, and CD services is moderate to high and consists primarily of local financial institutions that have a presence within the AA.

Columbus MSA

Demographic Information for Full Scope Area: Columbus MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	379	9.23	26.65	39.05	24.80	0.26
Population by Geography	1,581,066	6.60	22.56	42.13	28.47	0.23
Owner-Occupied Housing by Geography	391,666	2.94	17.51	45.74	33.81	0.00
Business by Geography	88,668	7.39	19.94	40.17	32.50	0.01
Farms by Geography	3,649	1.18	9.43	63.22	26.17	0.00
Family Distribution by Income Level	404,868	19.39	18.38	23.09	39.13	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	152,947	10.99	33.37	42.33	13.31	0.00
Median Family Income		54,708	Median Housing Value		119,650	
HUD Adjusted Median Family Income for 2004		60,600	Unemployment Rate (2000 US Census)		2.14%	
Households Below Poverty Level		9.93%				

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2004 HUD updated MFI

This AA consists of seven (i.e. Delaware, Fairfield, Franklin, Licking, Madison, Pickaway, and Union Counties) of the eight counties that comprise the Columbus MSA, which is located in central Ohio. The AA excludes Morrow County because the bank has no branches located in that county. The bank has not arbitrarily excluded low- or moderate-income geographies. The state's capital of Columbus is located in this MSA which is the second largest MSA in the state. NCB has 17 percent of its branches and 18 percent of its ATMs located within the AA. Over the evaluation period, 25 percent of home mortgage loans, and 16 percent of small loans to businesses and loans to farms were derived from this AA. The bank's primary business focus in the AA is traditional retail banking products.

NCB's deposits in this AA total \$2.4 billion. This represents 8 percent of the bank's total deposits based on FDIC deposit market share data as of June 30, 2005. NCB is the fourth largest deposit taking institution in the AA with a 9 percent market share. Major competitors in this AA include Bank One, N.A., Huntington National Bank, and Fifth Third Bank.

The Columbus MSA has a strong economy that has grown steadily over the previous four decades. Nearly 150,000 people in their twenties make up the city of Columbus' largest age group, which accounts for the City's smaller than average household size. Neighborhoods around the city's core suffered steep population declines over the previous decade while the population in outer neighborhoods and suburbs has increased.

Business diversity is the core strength of the local economy. The MSA contains successful companies of all sizes and is a mecca for new local businesses. Franklin County has led the state of Ohio in new business starts since 1996. The major industries consist of education, health and social services, followed by wholesale and retail trade. Columbus has a relatively limited number of jobs in the manufacturing sector and a relatively high proportion of jobs in the professional and scientific fields. Major employers include Abbott Labs, American Electric Power, Ashland Chemical, the Ohio State University, Battelle Memorial Institute, Grant/Riverside Hospitals, and Nationwide Insurance.

The unemployment rate has risen in the AA from 2.6 percent at year-end 2000 to 5.6 percent as of June 30, 2005. The state of Ohio's and the national unemployment rate were 6.2 percent and 5.0 percent, respectively. Pickaway County and Delaware County had the highest and lowest unemployment rates in the AA of 7.5 percent and 4.3 percent, respectively as of June 30, 2005. Almost ten percent of families live below the poverty level based on 2000 Census Data. The majority of the poverty in the Columbus MSA is concentrated in the city of Columbus' core neighborhoods.

The 2004 HUD adjusted median family income for the AA is \$60,600. Nineteen percent and 18 percent of families are low- and moderate-income, respectively, based on 2000 Census Data. The 2000 median housing value for the AA was \$119,650. This represents a 98 percent increase in the price of a home (\$60,404) from 1990 Census Data. Affordable housing is a significant need in the AA, as a large portion of the current housing stock requires significant rehabilitation. The city of Columbus has launched an effort to stimulate development within the AA in the hopes of revitalizing neighborhoods. This program created target investment districts for both affordable housing and commercial revitalization.

We determined the community's credit needs by contacting representatives from local housing and community service agencies and small business development organizations. The OCC's Central District Community Affairs Officers also provided information on credit needs.

We identified the following credit and non-credit related needs in this AA:

- Affordable housing (i.e. single family rental, multifamily rental, and homeownership) for low- and moderate-income individuals. Public and rental assisted housing and down payment assistance were also identified needs.
- Affordable home improvement/rehabilitation loans to improve the physical condition of the housing stock.
- Gap financing to promote home ownership and rental property ownership. Small business working capital loans to existing and start-up businesses.
- Technical assistance to new and existing small businesses was also identified as a need.

- Social services to low- and moderate-income families, including child care services, job training and counseling, credit and home ownership counseling, food donation, and health care services.

Community groups noted banking services in low- and moderate-income areas were either limited or very costly. Additionally, groups were concerned about the dominance of aggressive subprime and payday lenders within the inner city.

We determined that the opportunity to make CD loans and qualified investments and to provide CD services within the AA is high. The Columbus MSA is home to a number of CDC's that undertake affordable housing development and commercial real estate development. There has been considerable investment and some development in selected areas within the city of Columbus. Competition for CD loans, qualified investments, and CD services is moderate to high and consists primarily of local financial institutions that have a presence within the AA.

State of Florida Full-Scope Area

West Palm Beach AA

Demographic Information for Full Scope Area: West Palm Beach AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	30	13.33	46.67	23.33	16.67	0.00
Population by Geography	131,179	5.10	48.21	25.12	21.56	0.00
Owner-Occupied Housing by Geography	32,052	1.87	40.77	25.76	31.60	0.00
Business by Geography	16,196	8.26	44.32	31.38	16.05	0.00
Farms by Geography	357	3.08	45.10	21.29	30.53	0.00
Family Distribution by Income Level	31,587	25.64	19.03	20.79	34.53	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	14,111	8.34	59.76	21.45	10.45	0.00
Median Family Income HUD Adjusted Median Family Income for 2004 Households Below Poverty Level		53,777 61,100 8.95%	Median Housing Value Unemployment Rate (2000 US Census)		131,523 2.24%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2004 HUD updated MFI

The West Palm Beach AA consists of thirty census tracts in the city of West Palm Beach. West Palm Beach is the county seat of Palm Beach County (part of the West Palm Beach-Boca Raton MSA). The bank has not arbitrarily excluded low- or moderate-income geographies. The bank has one branch located in this AA that strictly conducts trust activities. The bank does not offer deposit accounts or retail loans to the general public, nor does it accept customer deposits in this AA.

The chart above details the demographics of the AA. The following is details for the city of West Palm Beach. Population is approximately 82,000 according to the 2000 census. The median household income was \$36,774, and the median household income for a family was \$42,074. Gains in income have failed to keep pace with the robust home price appreciation. Consequently, affordability may be emerging as an issue not only for lower- income households, but also for more affluent, white-collar homebuyers. Home prices rose to 4.4 times income levels in Florida during 2004, surpassing the corresponding national ratio for the first time. In the West Palm Beach area, home prices were more than six times income levels. In 2004, estimated median household income of \$43,982 was 26 percent below the amount needed to finance the purchase of the median priced house in Florida.

West Palm Beach is the commercial and business center of Palm Beach County. It is the oldest municipality in the county and has approximately 1,300 employees. The three major industries in Palm Beach County are tourism, construction and agriculture. There are also many high-tech industries contributing to the growing economy.

The unemployment rate for Palm Beach County has risen only slightly from 4.1 percent in January 2000 to 4.4 percent as of June 2005. The state of Florida's unemployment rates for the same time periods are lower and constant at 3.8 percent.

We determined the community's credit needs by utilizing OCC's community contact database. The database contains documented interviews with community development organizations to determine their community development purpose and community credit needs.

The identified community credit needs for this AA are construction and permanent financing for single-family dwellings, and micro-lending programs and partnerships with banks. A moderate level of opportunity is available for community development and other credit related projects. Competition is also moderate.

State of Illinois Full-Scope Area

Chicago AA

Demographic Information for Full Scope Area: Chicago AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	17	11.76	5.88	11.76	70.59	0.00
Population by Geography	43,674	4.41	1.32	2.26	92.02	0.00
Owner-Occupied Housing by Geography	10,491	0.39	0.00	1.63	97.98	0.00
Business by Geography	28,591	0.47	5.80	7.50	86.24	0.00
Farms by Geography	51	0.00	7.84	11.76	80.39	0.00
Family Distribution by Income Level	8,410	14.01	9.93	12.50	63.57	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	2,013	25.98	2.09	3.23	68.70	0.00
Median Family Income HUD Adjusted Median Family Income for 2004 Households Below Poverty Level		60,166 67,800 10.01%	Median Housing Value Unemployment Rate (2000 US Census)		174,526 3.20%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2004 HUD updated MFI

The Chicago AA consists of 17 tracts in city of Chicago (Cook County), part of the Chicago-Naperville-Joliet metropolitan division. The bank has not arbitrarily excluded low- or moderate-income geographies. The bank has one branch located in this AA that strictly conducts commercial lending activities. The bank does not offer deposit accounts or retail loans to the general public, nor does it accept customer deposits in this AA.

The chart above details the demographics of the AA. The following is details for the city of Chicago, a larger metropolitan area. As of the 2000 census, there were 2,896,016 people, 1,061,928 households, and 632,909 families. Of the city population, 26.2% are under the age of 18, 11.2% are from 18 to 24, 33.4% are from 25 to 44, 18.9% are from 45 to 64, and 10.3% are 65 years of age and older. The median income for a household in the city was \$38,625, and the median income for a family was \$42,724. The per capita income for the city was \$20,175. Below the poverty line are 19.6% of the population and 16.6% of the families. Of the total population, 28.1% of those under the age of 18, and 15.5% of those 65 and older, are living below the poverty line.

During the past four years, home price appreciation in Illinois outpaced personal income growth that attributes to declining housing affordability for some consumers. However, home values in the state continue to rise slower than the national average.

Chicago is the United States' second largest financial center with the nation's second largest central business district and third largest gross metropolitan product, which is approximately \$390 billion. Manufacturing (which includes chemicals, metal, machinery, and consumer electronics), printing and publishing, and food processing also play major roles in the city's economy. Nevertheless, much of the manufacturing occurs outside the city limits.

The unemployment rate for Cook County has risen from 4.8 percent at the beginning of 2000, to 7.2 percent as of June 30, 2005. The Illinois State unemployment rates for the same time periods are lower at 4.4 percent and 5.9 percent, respectively.

We determined the community's credit needs by utilizing OCC's community contact database. The database contains documented interviews with community development organizations to determine their community development purpose and community credit needs.

The identified community credit need for this AA is conventional home purchase mortgages for low- and moderate-income individuals and members of minority groups. Ample opportunities are available for community development and other credit related projects. However, competition is keen.

State of Michigan Full-Scope Area

Birmingham AA

Demographic Information for Full Scope Area: Birmingham AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	7	0.00	0.00	28.57	71.43	0.00
Population by Geography	19,294	0.00	0.00	29.37	70.63	0.00
Owner-Occupied Housing by Geography	6,949	0.00	0.00	30.61	69.39	0.00
Business by Geography	3,018	0.00	0.00	40.89	59.11	0.00
Farms by Geography	31	0.00	0.00	51.61	48.39	0.00
Family Distribution by Income Level	5,120	8.16	10.68	16.04	65.12	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	965	0.00	0.00	47.15	52.85	0.00
Median Family Income HUD Adjusted Median Family Income for 2004 Households Below Poverty Level		67,923 76,500 5.66%	Median Housing Value Unemployment Rate (2000 US Census)		164,218 2.08%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2004 HUD updated MFI

Birmingham AA consists of seven tracts in the city of Birmingham (Oakland County), part of the Warren-Farmington Hills-Troy metropolitan division. The bank has not arbitrarily excluded low- or moderate-income geographies. The bank has one branch located in this AA that strictly conducts commercial lending activities. The bank does not offer deposit accounts or retail loans to the general public, nor does it accept customer deposits in this AA.

Birmingham is a very affluent city and part of one of the wealthiest counties in the country. It is 4.73 square miles and located approximately halfway between the city of Detroit and the city of Pontiac

The chart above details the demographics of the AA. The following is detail for the city of Birmingham. The population is almost 20,000 according to the 2000 census. The median household income is just over \$100,000 and poverty just under 3 percent. The community's residents are fairly young with 35 percent of the residents between the ages of 25 and 44 and 26 percent between 45 and 64. The average selling price of a single-family home was \$369,201 in 2001, an increase of nearly 61% from 1997. There are few remaining sites on which to build new homes, so developers and homeowners renovate or enlarge, or raze and rebuild on existing property.

Oakland County's technology center, coined "Automation Alley," is one of largest employment centers for engineering and related occupations in the United States. Oakland County has shared in the recent economic hardships brought on by troubles at General Motors, Ford, and Daimler Chrysler, although it has fared better than Detroit and Flint, as its economy is more diverse and less reliant on manufacturing jobs. All three automotive companies are major employers within southeast Michigan, and have significant investments within Oakland County. The unemployment rate for Oakland County has risen from 3.3 percent at the beginning of 2000, to 6.0 percent as of June 30, 2005. The State of Michigan's unemployment rates for the same time periods are similar at 3.0 percent and 6.7 percent, respectively.

During 2004, home price appreciation accelerated and outpaced the state's personal income growth rate. Michigan boasts the fourth highest home ownership rate in the country, however, continued weak employment conditions combined with slower income and population growth and rising long term interest rates may reduce home affordability in the future.

We determined the community's credit needs by utilizing OCC's community contact database. The database contains documented interviews with community development organizations to determine their community development purpose and community credit needs.

We did not identify any community credit needs. We identified a limited number of organizations for community development. Competition is also limited.

State of Pennsylvania Full-Scope Area

Philadelphia AA

Demographic Information for Full Scope Area: Philadelphia AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	12	16.67	8.33	25.00	50.00	0.00
Population by Geography	49,211	5.06	8.76	17.98	68.20	0.00
Owner-Occupied Housing by Geography	9,279	0.72	12.36	8.04	78.88	0.00
Business by Geography	21,416	12.93	16.97	25.35	44.75	0.00
Farms by Geography	50	6.00	10.00	20.00	64.00	0.00
Family Distribution by Income Level	7,039	13.98	14.87	14.70	56.44	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	2,031	13.49	13.74	15.46	57.31	0.00
Median Family Income HUD Adjusted Median Family Income for 2004 Households Below Poverty Level		56,993 66,300 12.10%	Median Housing Value Unemployment Rate (2000 US Census)		124,584 3.17%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2004 HUD updated MFI

The Philadelphia AA consists of 12 census tracts in the City of Philadelphia (Philadelphia County), part of the Philadelphia metropolitan division. The bank has not arbitrarily excluded low- or moderate-income geographies. The bank has one branch located in this AA that strictly conducts commercial lending activities. The bank does not offer deposit accounts or retail loans to the general public, nor does it accept customer deposits in this AA.

Philadelphia is the fifth most populous city in the country and the largest in population and area in the Commonwealth of Pennsylvania. It is the second largest city on the U.S. East Coast (after New York City), and a major commercial, educational, and cultural center for the nation.

The chart above details the demographics of the AA. The following is detail for the city of Philadelphia. The population is almost 2 million people. There are 590,071 households, and 352,272 families residing in the city. The median income for a household was \$30,746, and the median income for a family was \$37,036. About 18.4 percent of families and 22.9 percent of the population were living below poverty. Home price appreciation has increased throughout the state. Philadelphia is identified as one of 55 “boom” housing markets nationwide.

The city is home to many major Fortune 500 companies, including cable television and internet provider Comcast, insurance companies CIGNA and Lincoln Financial Group, energy company Sunoco, food services company Aramark, Crown Holdings Incorporated, Rohm and Haas Company, the pharmaceutical company Glaxo, Smith, and Kline, Boeing helicopters division, and automotive parts retailer Pep Boys, Philadelphia's economy is heavily based upon manufacturing, refining, food, and financial services.

The unemployment rate for Philadelphia County has risen from 4.1 percent at the beginning of January 2000 to 7.2 percent as of June 2005. The State of Pennsylvania unemployment rate is lower for the same time period, 4.2 percent and 5.0, respectively.

We determined the community's credit needs by utilizing OCC's community contact database. The database contains documented interviews with community development organizations to determine their community development purpose and community credit needs.

The identified community credit needs for this AA are low-interest and long-term financing for real estate and business development, equity investment in real estate developments, and long-term small business financing. Ample opportunities are available for community development and other credit related projects. However, competition is keen.

Appendix D: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units

throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 6. Geographic Distribution of Small Loans to Businesses - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table 7. Geographic Distribution of Small Loans to Farms - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table 8. Borrower Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

Table 9. Borrower Distribution of Home Improvement Loans - See Table 8.

Table 10. Borrower Distribution of Refinance Loans - See Table 8.

Table 11. Borrower Distribution of Small Loans to Businesses - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

Table 12. Borrower Distribution of Small Loans to Farms - Compares the percentage distribution of the number of small loans (less than or equal to

\$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Tables of Performance Data

State of Ohio

State of Florida

State of Illinois

State of Michigan

State of Pennsylvania

Table 1. Lending Volume

LENDING VOLUME		Geography: OHIO						Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area (2002):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Cleveland-Lorain-Elyria MSA	20.75	20,349	1,829,315	9,727	727,864	11	1,318	19	81,031	30,106	2,641,375	56.90
Columbus MSA	21.42	21,819	2,345,709	5,701	426,636	10	462	28	31,078	31,078	2,806,361	11.31
Limited Review:												
Akron MSA	8.93	9,143	850,906	3,807	283,995	4	41	4	7,720	12,958	1,143,693	5.89
Canton-Massillon MSA	3.81	4,050	320,093	1,487	93,852	0	0	0	0	5,537	414,339	1.12
Cincinnati AA	1.80	2,407	315,139	208	22,047	1	150	0	0	2,616	337,505	.41
Dayton-Springfield MSA	17.20	20,304	1,889,410	4,615	435,619	9	1,047	26	41,832	24,954	2,369,326	6.76
Huntington MSA	.52	617	30,342	137	8,110	2	34	1	2,200	757	40,686	.37
Mansfield MSA	.39	406	17,238	147	11,283	6	476	1	1,250	560	30,524	.07
Steubenville-Weirton MSA	.54	526	31,704	250	10,175	1	10	2	107	779	41,996	1.06
Toledo MSA	7.92	8,095	704,167	3,372	276,385	9	1,391	18	7,848	11,494	990,184	3.60
Wheeling MSA	.39	364	21,497	204	10,935	0	0	0	0	568	32,432	.41
Youngstown-Warren MSA	4.28	3,466	236,641	2,732	199,380	3	256	15	11,462	6,216	447,873	3.74
NonMetropolitan Areas	12.05	12,400	863,636	3,986	299,920	167	11,039	7	8,828	17,488	1,292,888	8.36

* Loan Data as of December 31, 2002. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from October 1, 1999 to December 31, 2002.

*** Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: OHIO				Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Cleveland-Lorain-Elyria MSA	5,916	15.96	4.93	6.54	10.50	11.85	52.19	45.40	32.39	36.21	5.54	7.35	6.21	5.74	4.94	
Columbus MSA	9,528	25.71	3.72	1.86	16.34	10.23	47.34	47.10	32.61	40.81	10.66	5.30	8.67	12.6 1	9.64	
Limited Review:																
Akron MSA	3,217	8.68	3.13	1.87	14.12	12.81	58.64	59.84	24.10	25.49	9.09	9.40	12.80	9.62	6.87	
Canton-Massillon MSA	1,581	4.27	1.90	1.58	12.70	12.65	64.05	63.19	21.35	22.58	8.73	6.67	11.97	9.03	7.23	
Cincinnati MSA	1,007	2.72	0.00	0.00	4.48	4.47	62.40	44.79	33.12	50.74	6.43	0.00	4.00	5.99	7.22	
Dayton-Springfield MSA	8,117	21.90	4.05	2.44	13.58	9.81	55.51	50.15	26.85	37.60	15.18	11.1 8	13.00	14.9 3	16.4 7	
Huntington MSA	122	0.33	0.00	0.00	10.99	9.84	89.01	90.16	0.00	0.00	7.62	0.00	10.53	7.44	0.00	
Mansfield MSA	83	0.22	1.48	1.20	11.76	13.25	50.34	45.78	36.42	39.76	1.44	0.00	0.78	1.10	1.99	
Steubenville-Weirton MSA	122	0.33	2.92	0.82	9.15	5.74	76.49	65.57	11.44	27.87	4.60	0.00	1.96	4.32	7.87	
Toledo MSA	2,460	6.64	3.63	1.18	14.99	9.11	57.47	53.58	23.92	36.14	7.64	5.75	6.34	7.12	9.09	
Wheeling MSA	108	0.29	0.00	0.00	2.99	2.78	85.40	78.70	11.62	18.52	4.51	0.00	4.35	4.36	5.26	
Youngstown-Warren MSA	1,142	3.08	3.52	0.70	12.49	9.11	57.53	58.67	26.46	31.52	5.47	1.27	5.99	5.93	4.85	
NonMetropolitan Areas	3,654	9.86	0.39	0.25	19.95	16.04	63.35	63.46	16.31	20.25	9.17	15.0 0	8.71	9.10	9.66	

* Based on 2002 Peer Mortgage Data (CE)

** Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full Review:																
Cleveland-Lorain-Elyria MSA	3,736	24.63	4.93	6.24	10.50	11.83	52.19	51.74	32.39	30.19	11.49	11.11	10.81	11.84	11.22	
Columbus MSA	2,804	18.48	3.72	4.71	16.34	18.65	47.34	49.18	32.61	27.46	11.29	16.52	14.04	11.41	9.01	
Limited Review:																
Akron MSA	1,180	7.78	3.13	4.07	14.12	15.42	58.64	57.63	24.10	22.88	10.54	18.18	9.38	10.64	10.09	
Canton-Massillon MSA	520	3.43	1.90	1.73	12.70	14.62	64.05	65.38	21.35	18.27	8.67	11.76	9.92	8.41	8.04	
Cincinnati MSA	194	1.28	0.00	0.00	4.48	2.06	62.40	56.19	33.12	41.75	7.16	0.00	10.53	7.22	6.70	
Dayton-Springfield MSA	2,027	13.36	4.05	4.79	13.58	13.07	55.51	56.68	26.85	25.46	13.11	15.93	10.48	13.00	14.49	
Huntington MSA	167	1.10	0.00	0.00	10.99	3.59	89.01	96.41	0.00	0.00	17.62	0.00	3.13	19.81	0.00	
Mansfield MSA	161	1.06	1.48	1.86	11.76	14.29	50.34	44.72	36.42	39.13	7.44	0.00	3.23	8.65	7.96	
Steubenville-Weirton MSA	98	0.65	2.92	1.02	9.15	5.10	76.49	71.43	11.44	22.45	4.27	0.00	3.23	4.11	7.14	
Toledo MSA	1,366	9.00	3.63	3.88	14.99	15.23	57.47	56.66	23.92	24.23	12.92	18.87	11.30	11.78	16.73	
Wheeling MSA	71	0.47	0.00	0.00	2.99	4.23	85.40	84.51	11.62	11.27	5.41	0.00	0.00	5.38	10.00	
Youngstown-Warren MSA	538	3.55	3.52	2.97	12.49	12.08	57.53	61.90	26.46	23.05	4.62	6.67	5.77	4.72	3.63	
NonMetropolitan Areas	2,309	15.22	0.39	0.39	19.95	20.57	63.35	63.75	16.31	15.29	12.25	22.22	13.10	12.01	11.87	

^{*} Based on 2002 Peer Mortgage Data (CE)

^{**} Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: OHIO		Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																		
Cleveland-Lorain-Elyria MSA	10,625	20.63	4.93	3.29	10.50	7.08	52.19	45.49	32.39	44.14	4.49	4.44	3.82	4.16	5.02			
Columbus MSA	9,439	18.33	3.72	2.28	16.34	10.00	47.34	43.19	32.61	44.53	5.08	5.05	4.72	5.09	5.15			
Limited Review:																		
Akron MSA	4,733	9.19	3.13	2.64	14.12	10.56	58.64	52.91	24.10	33.89	6.32	3.57	5.57	6.15	7.13			
Canton-Massillon MSA	1,943	3.77	1.90	1.13	12.70	9.47	64.05	60.78	21.35	28.62	4.99	1.97	3.25	4.97	5.79			
Cincinnati MSA	1,200	2.33	0.00	0.00	4.48	1.67	62.40	49.00	33.12	49.33	5.35	0.00	3.79	4.96	5.94			
Dayton-Springfield MSA	10,129	19.67	4.05	2.20	13.58	8.09	55.51	45.50	26.85	44.21	11.40	8.90	9.37	10.39	13.26			
Huntington MSA	328	0.64	0.00	0.00	10.99	7.93	89.01	92.07	0.00	0.00	11.11	0.00	7.95	11.36	0.00			
Mansfield MSA	156	0.30	1.48	1.28	11.76	9.62	50.34	52.56	36.42	36.54	0.82	0.00	0.79	0.76	0.91			
Steubenville-Weirton MSA	306	0.59	2.92	0.98	9.15	4.25	76.49	72.55	11.44	22.22	5.40	0.00	0.94	5.75	5.79			
Toledo MSA	4,262	8.28	3.63	0.99	14.99	6.50	57.47	54.15	23.92	38.36	6.70	2.97	4.85	6.13	8.21			
Wheeling MSA	185	0.36	0.00	0.00	2.99	1.62	85.40	72.97	11.62	25.41	4.32	0.00	0.00	3.81	7.53			
Youngstown-Warren MSA	1,782	3.46	3.52	1.35	12.49	6.96	57.53	58.64	26.46	33.05	3.58	3.81	3.11	3.65	3.56			
NonMetropolitan Areas	6,411	12.45	0.39	0.22	19.95	16.18	63.35	63.95	16.31	19.65	6.65	0.00	7.17	6.83	5.87			

* Based on 2002 Peer Mortgage Data (CE)

** Home refinance loans originated in the MA/AA as a percentage of all home refinance loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: OHIO				Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp	
Full Review:																
Cleveland-Lorain-Elyria MSA	0	0.00	16.72	0.00	13.13	0.00	48.84	0.00	21.31	0.00	0.00	0.00	0.00	0.00	0.00	
Columbus MSA	1	12.50	16.62	0.00	24.85	0.00	37.10	0.00	21.43	100.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Akron MSA	1	12.50	10.37	0.00	18.36	0.00	53.54	100.00	17.74	0.00	0.00	0.00	0.00	0.00	0.00	
Canton-Massillon MSA	0	0.00	12.17	0.00	10.82	0.00	43.59	0.00	33.41	0.00	0.00	0.00	0.00	0.00	0.00	
Cincinnati MSA	3	37.50	0.00	0.00	14.63	0.00	52.71	33.33	32.66	66.67	0.00	0.00	0.00	0.00	0.00	
Dayton-Springfield MSA	3	37.50	11.84	0.00	20.74	0.00	47.82	33.33	19.60	66.67	0.00	0.00	0.00	0.00	0.00	
Huntington MSA	0	0.00	0.00	0.00	21.33	0.00	78.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Mansfield MSA	0	0.00	4.73	0.00	8.61	0.00	62.60	0.00	24.06	0.00	0.00	0.00	0.00	0.00	0.00	
Steubenville-Weirton MSA	0	0.00	41.07	0.00	1.70	0.00	36.45	0.00	20.78	0.00	0.00	0.00	0.00	0.00	0.00	
Toledo MSA	0	0.00	10.27	0.00	20.13	0.00	50.00	0.00	19.61	0.00	0.00	0.00	0.00	0.00	0.00	
Wheeling MSA	0	0.00	0.00	0.00	24.16	0.00	56.76	0.00	19.08	0.00	0.00	0.00	0.00	0.00	0.00	
Youngstown-Warren MSA	0	0.00	11.99	0.00	9.43	0.00	47.11	0.00	31.47	0.00	0.00	0.00	0.00	0.00	0.00	
NonMetropolitan Areas	0	0.00	3.52	0.00	22.03	0.00	57.27	0.00	17.18	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2002 Peer Mortgage Data (CE)

** Multi-family loans originated in the MA/AA as a percentage of all multi-family loans originated in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: OHIO				Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
Full Review:																
Cleveland-Lorain-Elyria MSA	9,404	26.18	7.77	8.00	9.17	10.14	43.85	45.01	36.00	36.85	4.86	6.90	5.04	4.76	4.88	
Columbus MSA	5,597	15.58	7.47	8.42	15.05	14.29	39.87	41.56	36.04	35.73	4.57	5.50	4.47	4.81	4.50	
Limited Review:																
Akron MSA	3,807	10.60	5.81	5.86	13.35	10.22	50.85	48.88	29.98	35.04	6.84	5.89	4.95	6.83	8.49	
Canton-Massillon MSA	1,487	4.14	6.26	6.25	10.01	9.62	57.57	53.06	26.16	31.07	3.47	4.50	2.70	3.24	4.40	
Cincinnati MSA	208	0.58	0.00	0.00	6.90	3.85	58.99	66.83	34.06	29.33	1.96	0.00	0.00	2.61	1.27	
Dayton-Springfield MSA	4,612	12.84	8.87	11.99	15.56	15.65	47.34	36.97	28.22	35.39	6.71	10.17	6.73	5.44	8.62	
Huntington MSA	137	0.38	0.00	0.00	18.38	13.14	81.62	86.86	0.00	0.00	7.85	0.00	10.26	8.61	0.00	
Mansfield MSA	147	0.41	6.35	2.72	15.13	10.20	48.49	51.02	30.03	36.05	0.95	0.00	0.21	1.22	1.23	
Steubenville-Weirton MSA	250	0.70	16.02	28.00	6.09	4.00	57.70	42.80	20.18	25.20	3.92	9.25	5.08	2.65	4.74	
Toledo MSA	3,370	9.38	9.02	8.87	11.50	11.01	51.73	49.85	27.48	30.27	5.98	7.33	5.75	5.85	6.53	
Wheeling MSA	204	0.57	0.00	0.00	13.28	27.94	62.54	53.92	24.19	18.14	2.72	0.00	14.42	1.82	1.93	
Youngstown-Warren MSA	2,709	7.54	6.63	8.31	10.85	10.56	51.61	50.94	30.70	30.20	5.58	11.48	5.97	5.58	5.04	
NonMetropolitan Areas	3,986	11.10	1.23	0.80	19.67	12.19	63.39	67.74	15.72	19.27	4.04	3.38	3.61	4.33	5.01	

* Based on 2002 Peer Small Business Data -- US and PR

** Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

*** Source Data - Dun and Bradstreet (2002).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: OHIO				Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans						
Full Review:																
Cleveland-Lorain-Elyria MSA	11	4.93	1.54	0.00	4.77	0.00	53.87	27.27	39.67	72.73	2.86	0.00	0.00	0.00	7.69	
Columbus MSA	10	4.48	1.27	0.00	8.00	0.00	64.23	80.00	26.40	20.00	1.20	0.00	0.00	1.15	1.96	
Limited Review:																
Akron MSA	4	1.79	2.44	0.00	3.77	0.00	63.34	75.00	30.45	25.00	0.00	0.00	0.00	0.00	0.00	
Canton-Massillon MSA	0	0.00	1.64	0.00	1.86	0.00	83.79	0.00	12.71	0.00	0.00	0.00	0.00	0.00	0.00	
Cincinnati MSA	1	0.45	0.00	0.00	3.87	0.00	80.66	100.00	15.47	0.00	0.00	0.00	0.00	0.00	0.00	
Dayton-Springfield MSA	9	4.04	0.99	0.00	8.04	11.11	70.59	33.33	20.34	55.56	0.40	0.00	1.72	0.26	0.00	
Huntington MSA	2	0.90	0.00	0.00	11.72	0.00	88.28	100.00	0.00	0.00	50.00	0.00	0.00	50.00	0.00	
Mansfield MSA	6	2.69	0.25	0.00	3.23	0.00	55.58	100.00	40.94	0.00	6.67	0.00	0.00	10.53	0.00	
Steubenville-Weirton MSA	1	0.45	2.01	0.00	7.38	0.00	85.91	100.00	4.70	0.00	0.00	0.00	0.00	0.00	0.00	
Toledo MSA	9	4.04	0.85	11.11	3.69	0.00	81.84	77.78	13.62	11.11	0.33	0.00	0.00	0.35	0.00	
Wheeling MSA	0	0.00	0.00	0.00	2.02	0.00	90.91	0.00	7.07	0.00	0.00	0.00	0.00	0.00	0.00	
Youngstown-Warren MSA	3	1.35	0.76	0.00	3.13	0.00	70.84	66.67	25.19	33.33	3.28	0.00	0.00	1.92	14.29	
NonMetropolitan Areas	167	74.89	0.10	0.00	10.51	4.19	72.42	81.44	16.97	14.37	3.60	0.00	0.00	4.09	2.61	

* Based on 2002 Peer Small Business Data -- US and PR

** Small loans to farms originated in the MA/AA as a percentage of all small loans to farms originated in the rated area.

*** Source Data - Dun and Bradstreet (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: OHIO					Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share [*]				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total [*]	% Families ^{***}	% BANK Loans ^{***}	% BANK Loans [†]	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{***}	% Families ^{***}	% BANK Loans ^{***}						
Full Review:																
Cleveland-Lorain-Elyria MSA	5,341	14.96	19.66	11.07	17.09	28.38	24.00	25.99	39.25	34.56	5.17	6.56	5.57	4.86	4.69	
Columbus MSA	9,332	26.13	19.07	8.84	17.99	30.45	24.61	31.48	38.33	29.22	10.76	9.87	13.17	11.94	7.95	
Limited Review:																
Akron MSA	3,098	8.68	19.15	10.39	18.39	27.82	23.87	27.37	38.59	34.41	8.87	11.70	11.43	8.75	6.56	
Canton-Massillon MSA	1,555	4.35	18.08	11.51	18.26	28.87	25.33	31.77	38.33	27.85	8.66	10.87	10.75	8.36	6.81	
Cincinnati MSA	981	2.75	14.40	6.32	16.49	19.67	25.00	33.13	44.12	40.88	6.41	9.51	6.22	7.95	5.02	
Dayton-Springfield MSA	7,857	22.00	19.59	12.78	17.94	29.55	24.42	29.40	38.06	28.27	15.08	15.78	15.53	14.88	14.46	
Huntington MSA	121	0.34	27.73	3.31	17.33	22.31	18.31	29.75	36.63	44.63	7.79	3.03	8.89	6.92	8.25	
Mansfield MSA	80	0.22	17.79	13.75	17.83	21.25	24.33	40.00	40.05	25.00	1.45	2.06	0.85	1.76	1.47	
Steubenville-Weirton MSA	120	0.34	22.96	8.33	18.45	15.00	22.08	29.17	36.51	47.50	4.37	2.33	5.00	4.38	4.37	
Toledo MSA	2,405	6.73	20.78	9.81	17.28	24.99	23.50	30.69	38.44	34.51	7.66	7.33	7.51	8.72	6.93	
Wheeling MSA	106	0.30	21.47	10.38	19.84	20.75	21.71	31.13	36.97	37.74	4.55	3.77	3.33	5.91	4.23	
Youngstown-Warren MSA	1,108	3.10	19.93	10.92	18.37	29.24	22.80	28.43	38.90	31.41	5.51	6.21	6.92	5.33	4.53	
NonMetropolitan Areas	3,605	10.10	19.89	9.40	18.39	26.16	24.04	29.26	37.68	35.17	9.27	9.49	10.89	9.12	8.23	

^{*} Based on 2002 Peer Mortgage Data (CE)

^{**} As a percentage of loans with borrower income information available. No information was available for 3.74% of loans originated by bank.

^{***} Percentage of Families is based on the 1990 Census information.

^{****} Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

[†] Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: OHIO					Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% BANK Loans ²	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland-Lorain-Elyria MSA	3,676	24.37	19.66	12.87	17.09	22.93	24.00	26.99	39.25	37.21	11.56	12.55	11.16	10.65	12.23
Columbus MSA	2,794	18.52	19.07	12.20	17.99	23.69	24.61	29.46	38.33	34.65	11.41	12.32	12.68	9.71	11.63
Limited Review:															
Akron MSA	1,177	7.80	19.15	10.79	18.39	20.31	23.87	29.65	38.59	39.25	10.63	8.33	10.29	10.50	12.28
Canton-Massillon MSA	520	3.45	18.08	10.77	18.26	23.08	25.33	27.69	38.33	38.46	8.75	9.90	6.73	5.88	13.03
Cincinnati MSA	193	1.28	14.40	9.84	16.49	18.13	25.00	32.64	44.12	39.38	7.24	10.42	3.96	6.02	9.20
Dayton-Springfield MSA	2,021	13.40	19.59	13.90	17.94	23.35	24.42	30.23	38.06	32.51	13.18	8.72	13.33	15.26	14.01
Huntington MSA	167	1.11	27.73	4.19	17.33	13.17	18.31	30.54	36.63	52.10	17.84	7.14	10.42	19.67	23.08
Mansfield MSA	161	1.07	17.79	12.42	17.83	19.88	24.33	32.92	40.05	34.78	7.48	6.06	4.94	10.00	7.69
Steubenville-Weirton MSA	98	0.65	22.96	9.18	18.45	12.24	22.08	31.63	36.51	46.94	4.27	3.33	2.22	6.41	3.91
Toledo MSA	1,364	9.04	20.78	14.59	17.28	21.63	23.50	28.74	38.44	35.04	13.03	14.08	9.20	12.60	16.16
Wheeling MSA	70	0.46	21.47	17.14	19.84	14.29	21.71	21.43	36.97	47.14	5.41	4.88	1.64	6.73	6.67
Youngstown-Warren MSA	538	3.57	19.93	13.94	18.37	22.12	22.80	27.51	38.90	36.43	4.66	5.50	4.05	4.10	5.22
NonMetropolitan Areas	2,308	15.30	19.89	12.18	18.39	21.58	24.04	26.95	37.68	39.30	12.33	16.45	11.26	10.95	12.91

^{*} Based on 2002 Peer Mortgage Data (CE)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.57% of loans originated by bank.

^{***} Percentage of Families is based on the 1990 Census information.

^{****} Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% BANK Loans ³	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans**	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
Cleveland-Lorain-Elyria MSA	9,867	20.81	19.66	8.52	17.09	19.10	24.00	25.99	39.25	46.39	4.18	4.32	3.88	3.97	4.48	
Columbus MSA	8,932	18.84	19.07	8.74	17.99	19.67	24.61	26.76	38.33	44.83	5.17	5.82	4.94	4.88	5.33	
Limited Review:																
Akron MSA	4,473	9.43	19.15	7.67	18.39	18.87	23.87	24.90	38.59	48.56	6.19	6.02	5.52	5.80	6.82	
Canton-Massillon MSA	1,827	3.85	18.08	7.55	18.26	18.61	25.33	29.06	38.33	44.77	4.76	2.75	4.24	4.35	5.96	
Cincinnati MSA	1,010	2.13	14.40	5.74	16.49	13.86	25.00	26.34	44.12	54.06	4.92	4.34	4.21	4.88	5.24	
Dayton-Springfield MSA	8,410	17.74	19.59	10.29	17.94	20.63	24.42	25.92	38.06	43.16	10.31	10.10	9.95	9.58	11.11	
Huntington MSA	318	0.67	27.73	4.40	17.33	11.64	18.31	18.24	36.63	65.72	11.38	8.22	7.23	7.61	14.56	
Mansfield MSA	153	0.32	17.79	9.80	17.83	28.76	24.33	31.37	40.05	30.07	0.81	0.67	1.20	0.53	0.82	
Steubenville-Weirton MSA	295	0.62	22.96	7.46	18.45	12.54	22.08	24.75	36.51	55.25	5.27	8.70	3.56	4.64	5.75	
Toledo MSA	4,010	8.46	20.78	7.13	17.28	18.08	23.50	26.08	38.44	48.70	6.69	5.07	5.53	6.32	7.86	
Wheeling MSA	180	0.38	21.47	6.11	19.84	12.22	21.71	23.89	36.97	57.78	4.26	2.04	2.86	4.55	4.88	
Youngstown-Warren MSA	1,712	3.61	19.93	6.72	18.37	17.46	22.80	27.34	38.90	48.48	3.53	3.60	3.05	3.75	3.60	
NonMetropolitan Areas	6,223	13.13	19.89	7.17	18.39	17.66	24.04	27.75	37.68	47.42	6.69	7.46	5.99	6.42	7.07	

* Based on 2002 Peer Mortgage Data (CE)

** As a percentage of loans with borrower income information available. No information was available for 7.94% of loans originated by bank.

*** Percentage of Families is based on the 1990 Census information.

**** Home refinance loans originated in the MA/AA as a percentage of all home refinance loans originated in the rated area.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: OHIO			Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Cleveland-Lorain-Elyria MSA	9,727	26.74	77.06	63.20	84.69	7.78	7.53	4.86	14.18
Columbus MSA	5,701	15.67	77.38	58.39	82.83	9.30	7.88	4.57	11.13
Limited Review:									
Akron MSA	3,807	10.47	77.77	64.59	84.53	7.64	7.83	6.84	19.35
Canton-Massillon MSA	1,487	4.09	78.41	69.74	86.42	7.53	6.05	3.47	10.78
Cincinnati MSA	208	0.57	76.83	50.00	73.56	15.38	11.06	1.96	4.47
Dayton-Springfield MSA	4,615	12.69	80.54	55.06	76.94	12.68	10.38	6.71	15.18
Huntington MSA	137	0.38	79.69	88.32	87.59	7.30	5.11	7.85	20.92
Mansfield MSA	147	0.40	80.30	57.14	84.35	8.16	7.48	0.95	1.90
Steubenville-Weirton MSA	250	0.69	81.33	69.60	95.20	2.80	2.00	3.92	11.83
Toledo MSA	3,372	9.27	77.58	55.25	82.33	9.13	8.54	5.98	12.22
Wheeling MSA	204	0.56	79.99	74.51	92.65	3.43	3.92	2.72	6.74
Youngstown-Warren MSA	2,732	7.51	78.89	65.85	84.48	8.27	7.25	5.58	14.78
NonMetropolitan Areas	3,986	10.96	80.16	66.51	83.44	9.28	7.28	4.04	10.38

^{*} Based on 2002 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 8.19% of small loans to businesses originated by the bank.

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: OHIO		Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [*]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Cleveland-Lorain-Elyria MSA	11	4.93	92.26	63.64	54.55	36.36	9.09	2.86	6.25
Columbus MSA	10	4.48	93.62	60.00	90.00	0.00	10.00	1.20	1.38
Limited Review:									
Akron MSA	4	1.79	91.85	0.00	100.00	0.00	0.00	0.00	0.00
Canton-Massillon MSA	0	0.00	95.40	0.00	0.00	0.00	0.00	0.00	0.00
Cincinnati MSA	1	0.45	91.71	0.00	0.00	100.00	0.00	0.00	0.00
Dayton-Springfield MSA	9	4.04	96.18	88.89	44.44	55.56	0.00	0.40	0.43
Huntington MSA	2	0.90	96.09	100.00	100.00	0.00	0.00	50.00	66.67
Mansfield MSA	6	2.69	96.28	66.67	66.67	33.33	0.00	6.67	8.33
Steubenville-Weirton MSA	1	0.45	97.32	0.00	100.00	0.00	0.00	0.00	0.00
Toledo MSA	9	4.04	95.39	66.67	55.56	22.22	22.22	0.33	0.35
Wheeling MSA	0	0.00	94.44	0.00	0.00	0.00	0.00	0.00	0.00
Youngstown-Warren MSA	3	1.35	95.18	100.00	66.67	33.33	0.00	3.28	4.26
NonMetropolitan Areas	167	74.89	97.03	83.83	80.24	16.17	3.59	3.60	3.96

^{*} Based on 2002 Peer Small Business Data -- US and PR

^{**} Small loans to farms originated in the MA/AA as a percentage of all small loans to farms originated in the rated area.

^{***} Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2002).

^{****} Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 17.49% of small loans to farms originated by the bank.

Table 1. Lending Volume

LENDING VOLUME		Geography: OHIO				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003						
MA/Assessment Area (2003):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review:												
Cleveland-Lorain-Elyria-MSA	20.11	8,249	1,052,576	2,462	236,494	3	373	7	9,767	10,714	1,289,443	63.89
Columbus MSA	21.60	9,841	1,353,806	1,657	126,594	5	853	5	359	11,503	1,481,253	9.84
Limited Review:												
Akron MSA	8.36	3,466	404,504	985	93,709	1	80	1	296	4,452	498,293	5.06
Canton-Massillon MSA	3.65	1,662	166,696	282	27,247	1	95	5	2,497	1,945	194,038	.97
Cincinnati MSA	2.50	1,257	188,639	72	9,538	1	13	0	0	1,330	198,190	.07
Dayton-Springfield MSA	19.87	9,155	1,009,087	1,425	140,816	6	507	6	1,190	10,586	1,150,410	5.63
Huntington-Ashland MSA	0.84	397	23,299	51	2,792	1	14	0	0	449	26,105	.32
Mansfield MSA	0.27	102	8,691	38	2,151	2	220	0	0	142	11,062	.06
Steubenville-Weirton MSA	0.45	187	14,155	55	3,488	0	0	1	6,750	242	17,643	.86
Toledo MSA	6.63	2,770	314,571	757	76,130	2	454	11	2,867	3,529	391,155	3.03
Wheeling MSA	0.48	204	15,642	52	2,552	0	0	0	0	256	18,194	.35
Youngstown-Warren MSA	4.29	1,576	135,623	708	61,709	1	113	3	1,591	2,285	197,445	3.02
NonMetropolitan Areas	10.95	4,732	446,229	1,064	82,751	37	3,059	1	150	5,833	532,039	6.90

* Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2003 to December 31, 2003.

*** Deposit Data as of June 30, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: OHIO					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BAN K Loans						
Full Review:																
Cleveland-Lorain-Elyria-MSA	2,435	17.53	4.45	2.96	12.35	10.92	48.18	46.98	35.02	39.14	6.35	4.23	6.34	6.36	6.59	
Columbus MSA	4,037	29.07	3.04	1.93	18.30	11.22	46.86	51.45	31.80	35.40	11.02	7.34	8.98	13.21	9.65	
Limited Review:																
Akron MSA	1,067	7.68	2.76	4.12	18.38	19.40	51.56	50.05	27.30	26.43	8.59	12.43	11.32	8.94	6.61	
Canton-Massillon MSA	574	4.13	0.92	0.87	14.69	13.76	65.16	64.98	19.23	20.38	9.35	16.67	10.58	9.61	7.92	
Cincinnati MSA	441	3.18	0.00	0.00	9.51	6.58	36.63	25.17	53.86	68.25	7.44	0.00	9.86	7.19	7.35	
Dayton-Springfield MSA	2,657	19.13	2.10	1.09	16.96	12.08	52.06	47.80	28.88	39.03	15.59	10.86	13.76	15.04	17.30	
Huntington-Ashland MSA	59	0.42	0.00	0.00	5.05	10.17	94.95	89.83	0.00	0.00	8.06	0.00	26.09	7.48	0.00	
Mansfield MSA	42	0.30	0.16	0.00	14.17	23.81	48.70	40.48	36.97	35.71	2.46	0.00	5.03	2.18	2.08	
Steubenville-Weirton MSA	39	0.28	0.92	0.00	8.50	2.56	87.23	94.87	3.35	2.56	5.98	0.00	1.82	6.58	2.94	
Toledo MSA	732	5.27	2.96	1.37	15.13	9.84	53.37	48.50	28.55	40.30	6.77	5.92	5.51	6.61	7.44	
Wheeling MSA	42	0.30	0.00	0.00	10.33	7.14	83.93	88.10	5.74	4.76	5.72	0.00	5.00	6.22	2.53	
Youngstown-Warren MSA	459	3.31	2.23	0.65	12.87	8.71	62.62	67.54	22.29	23.09	5.55	9.38	5.74	6.18	4.21	
NonMetropolitan Areas	1,303	9.38	0.06	0.00	12.89	10.21	71.27	66.85	15.77	22.95	9.28	0.00	9.27	8.83	10.94	

* Based on 2003 Peer Mortgage Data (CE)

** Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total†	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Cleveland-Lorain-Elyria-MSA	307	35.09	4.45	8.79	12.35	16.29	48.18	47.56	35.02	27.36	8.84	11.67	7.86	7.85	10.78	
Columbus MSA	125	14.29	3.04	4.00	18.30	24.80	46.86	54.40	31.80	16.80	6.29	5.94	6.75	6.67	5.27	
Limited Review:																
Akron MSA	36	4.11	2.76	5.56	18.38	13.89	51.56	52.78	27.30	27.78	4.50	7.14	2.89	4.30	6.97	
Canton-Massillon MSA	23	2.63	0.92	0.00	14.69	21.74	65.16	65.22	19.23	13.04	4.52	0.00	2.99	4.46	7.48	
Cincinnati MSA	7	0.80	0.00	0.00	9.51	0.00	36.63	71.43	53.86	28.57	2.75	0.00	2.50	4.59	1.86	
Dayton-Springfield MSA	97	11.09	2.10	8.25	16.96	23.71	52.06	48.45	28.88	19.59	6.61	18.18	8.27	5.87	5.94	
Huntington-Ashland MSA	40	4.57	0.00	0.00	5.05	0.00	94.95	100.00	0.00	0.00	20.81	0.00	0.00	21.90	0.00	
Mansfield MSA	1	0.11	0.16	0.00	14.17	0.00	48.70	100.00	36.97	0.00	0.70	0.00	0.00	1.46	0.00	
Steubenville-Weirton MSA	6	0.69	0.92	0.00	8.50	0.00	87.23	100.00	3.35	0.00	2.99	0.00	0.00	3.40	0.00	
Toledo MSA	37	4.23	2.96	5.41	15.13	16.22	53.37	56.76	28.55	21.62	4.12	5.66	3.41	4.00	4.81	
Wheeling MSA	13	1.49	0.00	0.00	10.33	0.00	83.93	84.62	5.74	15.38	4.50	0.00	0.00	4.58	22.22	
Youngstown-Warren MSA	38	4.34	2.23	5.26	12.87	15.79	62.62	65.79	22.29	13.16	3.40	13.04	4.28	3.04	3.51	
NonMetropolitan Areas	145	16.57	0.06	0.00	12.89	29.66	71.27	61.38	15.77	8.97	8.20	0.00	14.55	7.39	5.51	

* Based on 2003 Peer Mortgage Data (CE)

** Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{**} *	% BANK Loans						
Full Review:																
Cleveland-Lorain-Elyria-MSA	5,505	19.09	4.45	1.87	12.35	8.08	48.18	42.85	35.02	47.19	5.52	4.29	5.43	5.26	5.86	
Columbus MSA	5,678	19.69	3.04	1.81	18.30	11.89	46.86	46.11	31.80	40.19	5.70	5.60	5.66	6.12	5.29	
Limited Review:																
Akron MSA	2,363	8.20	2.76	1.90	18.38	13.80	51.56	49.85	27.30	34.45	6.43	6.23	6.83	6.56	6.12	
Canton-Massillon MSA	1,065	3.69	0.92	0.19	14.69	10.42	65.16	58.59	19.23	30.80	5.59	2.22	5.80	5.18	6.53	
Cincinnati MSA	809	2.81	0.00	0.00	9.51	4.70	36.63	24.72	53.86	70.58	4.94	0.00	4.98	4.37	5.17	
Dayton-Springfield MSA	6,401	22.20	2.10	0.92	16.96	9.15	52.06	48.10	28.88	41.82	12.46	11.20	10.39	12.40	13.12	
Huntington-Ashland MSA	298	1.03	0.00	0.00	5.05	5.03	94.95	94.97	0.00	0.00	16.61	0.00	19.23	16.49	0.00	
Mansfield MSA	59	0.20	0.16	0.00	14.17	5.08	48.70	59.32	36.97	35.59	1.06	0.00	0.60	1.32	0.88	
Steubenville-Weirton MSA	142	0.49	0.92	0.00	8.50	4.93	87.23	88.73	3.35	6.34	6.23	0.00	4.52	6.26	8.41	
Toledo MSA	2,001	6.94	2.96	0.50	15.13	7.20	53.37	49.03	28.55	43.28	7.00	2.92	5.30	6.79	7.80	
Wheeling MSA	149	0.52	0.00	0.00	10.33	7.38	83.93	79.19	5.74	13.42	7.74	0.00	6.75	7.32	13.25	
Youngstown-Warren MSA	1,079	3.74	2.23	1.11	12.87	6.95	62.62	65.99	22.29	25.95	4.73	7.86	4.27	5.13	3.99	
NonMetropolitan Areas	3,284	11.39	0.06	0.06	12.89	10.75	71.27	69.24	15.77	19.95	7.37	15.38	8.63	7.31	7.00	

^{*} Based on 2003 Peer Mortgage Data (CE)

^{**} Home refinance loans originated in the MA/AA as a percentage of all home refinance loans originated in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: OHIO				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Cleveland-Lorain-Elyria-MSA	0	0.00	11.61	0.00	26.38	0.00	43.61	0.00	18.40	0.00	0.00	0.00	0.00	0.00	0.00	
Columbus MSA	1	100.00	13.96	0.00	31.24	100.00	35.59	0.00	19.21	0.00	0.43	0.00	1.16	0.00	0.00	
Limited Review:																
Akron MSA	0	0.00	12.03	0.00	24.76	0.00	44.88	0.00	18.33	0.00	0.00	0.00	0.00	0.00	0.00	
Canton-Massillon MSA	0	0.00	6.01	0.00	15.88	0.00	49.84	0.00	28.27	0.00	0.00	0.00	0.00	0.00	0.00	
Cincinnati MSA	0	0.00	0.00	0.00	21.46	0.00	37.32	0.00	41.22	0.00	0.00	0.00	0.00	0.00	0.00	
Dayton-Springfield MSA	0	0.00	8.77	0.00	21.39	0.00	49.98	0.00	19.86	0.00	0.00	0.00	0.00	0.00	0.00	
Huntington-Ashland MSA	0	0.00	0.00	0.00	25.55	0.00	74.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Mansfield MSA	0	0.00	1.06	0.00	25.75	0.00	48.29	0.00	24.91	0.00	0.00	0.00	0.00	0.00	0.00	
Steubenville-Weirton MSA	0	0.00	1.32	0.00	49.89	0.00	41.78	0.00	7.01	0.00	0.00	0.00	0.00	0.00	0.00	
Toledo MSA	0	0.00	7.45	0.00	22.43	0.00	52.10	0.00	18.01	0.00	0.00	0.00	0.00	0.00	0.00	
Wheeling MSA	0	0.00	0.00	0.00	30.15	0.00	55.40	0.00	14.45	0.00	0.00	0.00	0.00	0.00	0.00	
Youngstown-Warren MSA	0	0.00	7.10	0.00	16.32	0.00	60.53	0.00	16.05	0.00	0.00	0.00	0.00	0.00	0.00	
NonMetropolitan Areas	0	0.00	1.95	0.00	20.39	0.00	63.15	0.00	14.50	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2003 Peer Mortgage Data (CE)

** Multi-family loans originated in the MA/AA as a percentage of all multi-family loans originated in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: OHIO				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans						
Full Review:																
Cleveland-Lorain-Elyria-MSA	2,429	25.39	7.44	5.15	14.30	13.67	41.01	37.88	36.41	43.31	5.04	4.63	5.44	4.73	5.47	
Columbus MSA	1,657	17.32	7.78	7.91	21.23	19.01	40.51	39.41	30.47	33.68	4.57	6.11	4.78	4.53	4.60	
Limited Review:																
Akron MSA	985	10.29	9.28	9.95	14.73	10.25	43.19	44.26	32.79	35.53	6.05	7.50	5.18	6.12	6.50	
Canton-Massillon MSA	282	2.95	3.99	1.77	15.33	7.09	57.85	63.12	22.82	28.01	3.39	1.77	2.06	3.83	3.68	
Cincinnati MSA	72	0.75	0.00	0.00	13.16	55.56	38.61	15.28	48.19	29.17	1.99	0.00	10.72	0.89	1.13	
Dayton-Springfield MSA	1,425	14.89	7.55	9.54	19.52	19.44	45.46	35.79	27.48	35.23	7.28	10.86	7.77	5.96	8.68	
Huntington-Ashland MSA	51	0.53	0.00	0.00	15.92	3.92	84.08	96.08	0.00	0.00	7.12	0.00	3.51	8.21	0.00	
Mansfield MSA	38	0.40	3.09	0.00	21.83	15.79	38.66	31.58	36.42	52.63	1.19	0.00	0.96	1.03	1.72	
Steubenville-Weirton MSA	55	0.57	1.86	0.00	20.76	25.45	71.99	65.45	5.39	9.09	4.58	0.00	7.11	4.24	8.93	
Toledo MSA	757	7.91	4.91	2.38	13.40	12.02	51.23	49.80	30.46	35.80	5.48	4.03	5.73	5.47	5.84	
Wheeling MSA	52	0.54	0.00	0.00	18.56	36.54	68.62	48.08	12.83	15.38	3.58	0.00	10.61	2.41	5.30	
Youngstown-Warren MSA	701	7.33	4.30	7.70	15.44	13.12	55.35	55.78	24.67	23.40	5.70	13.30	6.07	5.93	4.92	
NonMetropolitan Areas	1,064	11.12	0.99	0.47	15.57	13.25	69.19	63.16	14.25	23.12	4.28	3.25	4.73	4.00	6.07	

* Based on 2003 Peer Small Business Data -- US

** Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

*** Source Data - Dun and Bradstreet (2003).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS 2003			Geography: OHIO				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31,					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans						
Full Review:																
Cleveland-Lorain-Elyria-MSA	3	5.00	1.51	0.00	5.75	0.00	50.39	100.00	42.21	0.00	1.62	0.00	0.00	3.09	0.00	
Columbus MSA	5	8.33	1.33	0.00	10.96	0.00	64.23	100.00	23.49	0.00	1.28	0.00	0.00	1.63	0.00	
Limited Review:																
Akron MSA	1	1.67	3.23	0.00	6.84	0.00	60.08	100.00	29.85	0.00	1.45	0.00	0.00	2.38	0.00	
Canton-Massillon MSA	1	1.67	0.63	0.00	8.47	0.00	74.48	100.00	16.42	0.00	1.72	0.00	0.00	2.50	0.00	
Cincinnati MSA	1	1.67	0.00	0.00	4.60	0.00	47.06	100.00	48.34	0.00	2.04	0.00	0.00	3.57	0.00	
Dayton-Springfield MSA	6	10.00	0.94	0.00	7.09	33.33	70.04	33.33	21.92	33.33	1.16	0.00	6.67	0.46	3.92	
Huntington-Ashland MSA	1	1.67	0.00	0.00	6.09	0.00	93.91	100.00	0.00	0.00	16.67	0.00	0.00	16.67	0.00	
Mansfield MSA	2	3.33	0.00	0.00	2.33	0.00	57.77	100.00	39.90	0.00	6.25	0.00	0.00	9.52	0.00	
Steubenville Weirton MSA	0	0.00	0.70	0.00	4.23	0.00	94.37	0.00	0.70	0.00	0.00	0.00	0.00	0.00	0.00	
Toledo MSA	2	3.33	0.84	0.00	3.80	0.00	73.89	100.00	21.46	0.00	0.39	0.00	0.00	0.42	0.00	
Wheeling MSA	0	0.00	0.00	0.00	2.26	0.00	96.05	0.00	1.69	0.00	0.00	0.00	0.00	0.00	0.00	
Youngstown-Warren MSA	1	1.67	0.50	0.00	3.32	0.00	73.28	0.00	22.90	100.00	1.33	0.00	0.00	0.00	7.69	
NonMetropolitan Areas	37	61.67	0.03	0.00	4.89	2.70	76.10	64.86	18.99	32.43	2.23	0.00	2.50	1.90	3.60	

* Based on 2003 Peer Small Business Data -- US

** Small loans to farms originated in the MA/AA as a percentage of all small loans to farms originated in the rated area.

*** Source Data - Dun and Bradstreet (2003).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 2003		Geography: OHIO						Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31,							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans***	% Families**	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland-Lorain-Elyria-MSA	2,435	17.53	19.78	11.96	17.69	25.85	22.07	26.86	40.47	35.33	5.97	7.23	5.63	5.66	6.14
Columbus MSA	4,037	29.07	19.44	12.14	18.33	37.47	22.97	27.91	39.26	22.48	11.19	12.50	14.49	11.57	7.58
Limited Review:															
Akron MSA	1,067	7.68	18.96	14.02	18.42	34.57	23.14	27.46	39.48	23.95	8.59	9.89	10.91	8.54	6.24
Canton-Massillon MSA	574	4.13	17.72	13.04	19.33	29.82	24.02	29.64	38.94	27.50	9.38	10.81	10.66	9.53	7.75
Cincinnati MSA	441	3.18	11.34	5.13	15.97	29.37	23.00	32.17	49.69	33.33	7.46	5.98	9.48	8.74	5.79
Dayton-Springfield MSA	2,657	19.13	19.16	12.21	18.64	27.54	22.94	29.08	39.26	31.17	15.31	15.42	15.07	16.25	14.70
Huntington-Ashland MSA	59	0.42	22.82	11.86	17.98	23.73	22.44	32.20	36.76	32.20	8.22	10.61	8.38	10.11	6.40
Mansfield MSA	42	0.30	17.54	14.29	19.03	33.33	23.16	35.71	40.27	16.67	2.49	3.19	3.23	3.07	1.22
Steubenville-Weirton MSA	39	0.28	20.14	7.69	19.31	35.90	22.60	20.51	37.95	35.90	6.07	3.53	7.33	4.23	7.91
Toledo MSA	732	5.27	20.43	10.94	17.94	26.85	22.44	27.41	39.19	34.80	6.69	6.69	6.84	6.49	6.74
Wheeling MSA	42	0.30	20.18	19.51	19.45	26.83	22.90	19.51	37.47	34.15	5.80	8.25	6.59	4.10	5.65
Youngstown-Warren MSA	459	3.31	18.79	10.74	18.76	33.56	22.61	27.52	39.84	28.19	5.57	5.65	6.96	5.32	4.66
NonMetropolitan Areas	1,303	9.38	18.10	10.53	19.49	28.93	24.13	28.62	38.28	31.92	9.26	9.10	9.95	9.05	8.94

* Based on 2003 Peer Mortgage Data (CE)

** As a percentage of loans with borrower income information available. No information was available for 4.21% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 2003			Geography: OHIO				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31,					Market Share				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Cleveland-Lorain-Elyria-MSA	307	35.09	19.78	17.92	17.69	23.78	22.07	23.78	40.47	34.53	8.83	10.00	7.59	7.25	10.88	
Columbus MSA	125	14.29	19.44	20.80	18.33	26.40	22.97	24.80	39.26	28.00	6.30	7.42	5.42	5.65	7.14	
Limited Review:																
Akron MSA	36	4.11	18.96	16.67	18.42	33.33	23.14	22.22	39.48	27.78	4.53	4.58	4.81	4.19	4.57	
Canton-Massillon MSA	23	2.63	17.72	26.09	19.33	21.74	24.02	21.74	38.94	30.43	4.56	4.80	3.40	3.18	7.03	
Cincinnati MSA	7	0.80	11.34	0.00	15.97	28.57	23.00	57.14	49.69	14.29	2.77	0.00	2.82	5.77	1.36	
Dayton-Springfield MSA	97	11.09	19.16	19.59	18.64	22.68	22.94	21.65	39.26	36.08	6.63	9.25	5.75	5.01	7.61	
Huntington-Ashland MSA	40	4.57	22.82	7.50	17.98	15.00	22.44	45.00	36.76	32.50	20.91	19.23	13.46	28.36	20.00	
Mansfield MSA	1	0.11	17.54	100.00	19.03	0.00	23.16	0.00	40.27	0.00	0.70	1.28	0.00	0.00	1.68	
Steubenville-Weirton MSA	6	0.69	20.14	0.00	19.31	16.67	22.60	50.00	37.95	33.33	3.04	0.00	2.78	4.55	3.33	
Toledo MSA	37	4.23	20.43	27.03	17.94	16.22	22.44	24.32	39.19	32.43	4.16	7.11	2.91	3.08	4.92	
Wheeling MSA	13	1.49	20.18	15.38	19.45	23.08	22.90	46.15	37.47	15.38	4.66	4.17	4.55	7.41	2.38	
Youngstown-Warren MSA	38	4.34	18.79	28.95	18.76	21.05	22.61	26.32	39.84	23.68	3.43	4.82	2.97	3.56	3.01	
NonMetropolitan Areas	145	16.57	18.10	20.00	19.49	22.76	24.13	26.90	38.28	30.34	8.26	10.91	7.97	6.61	9.03	

* Based on 2003 Peer Mortgage Data (CE)

** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2003			Geography: OHIO								Evaluation Period: JANUARY 1, 2003 TO				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans***	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland-Lorain-Elyria-MSA	5,507	19.10	19.78	11.22	17.69	19.22	22.07	26.81	40.47	42.76	5.28	7.24	4.75	5.05	5.32
Columbus MSA	5,678	19.69	19.44	10.29	18.33	21.63	22.97	25.17	39.26	42.91	5.43	6.78	5.50	5.07	5.35
Limited Review:															
Akron MSA	2,363	8.19	18.96	11.97	18.42	23.47	23.14	25.32	39.48	39.23	6.27	6.93	6.49	5.70	6.36
Canton-Massillon MSA	1,065	3.69	17.72	7.70	19.33	20.74	24.02	28.54	38.94	43.02	5.44	4.44	5.05	5.38	5.96
Cincinnati MSA	809	2.81	11.34	4.73	15.97	14.35	23.00	26.56	49.69	54.35	4.36	4.38	3.83	4.32	4.54
Dayton-Springfield MSA	6,401	22.20	19.16	8.00	18.64	20.69	22.94	27.25	39.26	44.06	10.73	10.53	10.52	10.81	10.83
Huntington-Ashland MSA	298	1.03	22.82	6.83	17.98	12.97	22.44	25.94	36.76	54.27	17.16	17.76	12.80	15.59	19.58
Mansfield MSA	59	0.20	17.54	5.36	19.03	30.36	23.16	16.07	40.27	48.21	1.06	0.71	1.62	0.60	1.18
Steubenville-Weirton MSA	142	0.49	20.14	7.14	19.31	19.29	22.60	29.29	37.95	44.29	6.29	4.93	5.90	5.82	7.20
Toledo MSA	2,001	6.94	20.43	6.30	17.94	20.20	22.44	28.14	39.19	45.36	6.58	4.94	6.58	6.47	6.96
Wheeling MSA	149	0.52	20.18	2.07	19.45	14.48	22.90	33.79	37.47	49.66	7.78	2.38	7.55	8.45	8.19
Youngstown MSA	1,079	3.74	18.79	9.62	18.76	20.58	22.61	27.31	39.84	42.50	4.86	5.77	4.73	4.59	4.93
NonMetropolitan Areas	3,284	11.39	18.10	8.17	19.49	18.11	24.13	27.90	38.28	45.82	7.34	7.87	6.52	6.82	8.00

* Based on 2003 Peer Mortgage Data (CE)

** As a percentage of loans with borrower income information available. No information was available for 14.84% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home refinance loans originated in the MA/AA as a percentage of all home refinance loans originated in the rated area.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES 2003		Geography: OHIO			Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31,				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Cleveland-Lorain-Elyria-MSA	2,462	25.62	64.30	51.10	78.35	10.89	10.76	5.04	8.31
Columbus MSA	1,657	17.25	62.90	48.46	83.34	7.79	8.87	4.57	6.73
Limited Review:									
Akron MSA	985	10.25	64.35	47.51	77.56	10.66	11.78	6.05	10.12
Canton-Massillon MSA	282	2.94	65.88	49.65	76.24	13.83	9.93	3.39	5.67
Cincinnati MSA	72	0.75	64.04	38.89	63.89	19.44	16.67	1.99	2.27
Dayton-Springfield MSA	1,425	14.83	63.94	43.37	76.91	11.79	11.30	7.28	8.95
Huntington-Ashland MSA	51	0.53	66.44	86.27	88.24	3.92	7.84	7.12	16.92
Mansfield MSA	38	0.40	65.19	50.00	84.21	10.53	5.26	1.19	1.51
Steubenville-Weirton MSA	55	0.57	65.24	56.36	90.91	5.45	3.64	4.58	8.12
Toledo MSA	757	7.88	62.19	44.39	75.43	13.08	11.49	5.48	6.64
Wheeling MSA	52	0.54	63.15	63.46	90.38	7.69	1.92	3.58	5.30
Youngstown-Warren MSA	708	7.37	65.27	55.65	79.52	10.73	9.75	5.70	10.15
NonMetropolitan Areas	1,064	11.07	65.94	49.91	81.02	11.56	7.42	4.28	5.46

* Based on 2003 Peer Small Business Data -- US

** Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 16.23% of small loans to businesses originated by the bank.

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS 2003		Geography: OHIO			Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31,				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Cleveland-Lorain-Elyria-MSA	3	5.00	89.74	100.00	33.33	66.67	0.00	1.62	2.05
Columbus MSA	5	8.33	91.57	100.00	40.00	40.00	20.00	1.28	1.75
Limited Review:									
Akron MSA	1	1.67	90.40	100.00	100.00	0.00	0.00	1.45	1.92
Canton-Massillon MSA	1	1.67	94.46	100.00	100.00	0.00	0.00	1.72	1.96
Cincinnati MSA	1	1.67	88.24	0.00	100.00	0.00	0.00	2.04	0.00
Dayton-Springfield MSA	6	10.00	93.65	50.00	66.67	16.67	16.67	1.16	0.63
Huntington-Ashland MSA	1	1.67	94.78	0.00	100.00	0.00	0.00	16.67	0.00
Mansfield MSA	2	3.33	95.60	100.00	50.00	50.00	0.00	6.25	7.14
Steubenville-Weirton MSA	0	0.00	95.77	0.00	0.00	0.00	0.00	0.00	0.00
Toledo MSA	2	3.33	94.16	50.00	0.00	50.00	50.00	0.39	0.21
Wheeling MSA	0	0.00	94.92	0.00	0.00	0.00	0.00	0.00	0.00
Youngstown-Warren MSA	1	1.67	93.44	100.00	0.00	100.00	0.00	1.33	1.61
NonMetropolitan Areas	37	61.67	96.08	83.78	72.97	24.32	2.70	2.23	2.04

* Based on 2003 Peer Small Business Data -- US

** Small loans to farms originated in the MA/AA as a percentage of all small loans to farms originated in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 16.18% of small loans to farms originated by the bank.

Table 1. Lending Volume

LENDING VOLUME		Geography: OHIO						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					
MA/Assessment Area (2004):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***	
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)		
Full Review:													
Cleveland-Elyria-Mentor MSA	21.36	5,219	622,763	2,888	266,398	6	1,211	6	18,765	8,139	954,888	67.78	
Columbus MSA	21.17	6,252	903,789	1,761	158,280	10	941	14	34,635	8,066	1,123,950	8.13	
Limited Review:													
Akron MSA	8.49	2,173	239,906	1,056	97,457	0	0	3	14,261	3,235	343,640	4.10	
Canton-Massillon MSA	3.78	1,044	99,330	388	35,027	4	312	0	0	1,441	137,166	1.05	
Cincinnati-Middletown MSA	2.21	756	119,632	86	11,810	0	0	5	4,062	842	131,442	0.31	
Dayton MSA	14.63	4,440	487,460	1,094	111,786	6	918	14	15,216	5,575	641,394	5.71	
Huntington-Ashland MSA	0.65	213	12,239	33	2,798	0	0	0	0	247	17,237	0.71	
Mansfield MSA	0.38	109	9,332	34	3,522	1	85	1	130	145	13,069	0.08	
Sandusky MSA	0.96	244	27,175	123	6,149	0	0	0	0	367	33,324	0.47	
Springfield MSA	2.52	802	69,605	158	10,985	0	0	0	0	960	80,590	0.79	
Toledo MSA	6.47	1,720	187,243	706	77,424	4	620	14	2,276	2,466	273,822	2.39	
Weirton-Steubenville MSA	0.49	135	9,301	46	1,688	0	0	1	2,800	185	20,646	0.65	
Wheeling MSA	0.45	126	8,649	45	1,512	0	0	0	0	171	10,161	0.31	
Youngstown-Warren-Boardman MSA	3.97	931	75,157	562	52,842	0	0	1	6	1,511	135,158	2.28	
NonMetropolitan Areas	12.47	3,283	278,693	1,309	122,379	143	9,548	4	14,371	4,750	490,240	5.24	

* Loan Data as of December 31, 2004. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2005 to December 31, 2005.

*** Deposit Data as of May 04, 2006. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: OHIO				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Cleveland-Elyria-Mentor MSA	2,275	16.98	4.83	2.64	12.41	9.89	48.22	50.95	34.54	36.53	5.75	2.87	5.02	6.24	5.77	
Columbus MSA	3,386	25.28	2.94	2.78	17.51	13.88	45.74	49.62	33.81	33.73	7.97	5.31	8.41	9.58	6.45	
Limited Review:																
Akron MSA	1,065	7.95	2.76	4.41	18.38	20.56	51.56	52.02	27.30	23.00	7.98	11.39	10.24	8.81	5.45	
Canton-Massillon MSA	539	4.02	0.92	0.56	14.69	14.84	65.16	65.68	19.23	18.92	8.40	6.06	9.91	8.71	6.81	
Cincinnati-Middletown MSA	391	2.92	0.00	0.00	9.51	8.70	36.63	24.55	53.86	66.75	6.25	0.00	11.66	5.86	6.02	
Dayton MSA	2,318	17.30	2.03	0.56	18.03	12.51	48.40	47.50	31.54	39.43	14.37	4.72	11.70	14.71	15.43	
Huntington-Ashland MSA	66	0.49	0.00	0.00	5.05	6.06	94.95	93.94	0.00	0.00	8.60	0.00	13.33	8.41	0.00	
Mansfield MSA	61	0.46	0.16	0.00	14.17	18.03	58.08	73.77	27.58	8.20	3.22	0.00	4.33	4.35	0.85	
Sandusky MSA	95	0.71	0.00	0.00	18.57	18.95	65.56	61.05	15.87	20.00	8.52	0.00	8.26	8.62	8.48	
Springfield MSA	361	2.70	1.73	1.11	9.72	7.20	59.32	61.50	29.23	30.19	15.35	5.71	9.22	16.09	17.67	
Toledo MSA	849	6.34	2.74	1.53	13.99	12.84	56.25	51.00	27.01	34.63	7.32	7.51	8.06	6.99	7.58	
Weirton-Steubenville MSA	55	0.41	0.92	0.00	8.50	3.64	87.23	87.27	3.35	9.09	8.02	0.00	3.51	8.12	14.71	
Wheeling MSA	50	0.37	0.00	0.00	10.33	6.00	83.93	80.00	5.74	14.00	6.19	0.00	4.17	6.04	9.46	
Youngstown-Warren-Boardman MSA	453	3.38	2.74	0.22	12.34	8.39	60.78	65.56	24.14	25.83	6.71	2.27	5.51	7.68	5.43	
NonMetropolitan Areas	1,431	10.68	0.06	0.07	11.64	11.46	75.99	75.61	12.31	12.86	8.20	20.00	10.45	8.05	7.37	

^{*} Based on 2004 Peer Mortgage Data (Eastern)

^{**} Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Cleveland-Elyria-Mentor MSA	352	31.51	4.83	7.67	12.41	15.34	48.22	46.59	34.54	30.40	6.09	6.21	5.76	5.73	6.91	
Columbus MSA	155	13.88	2.94	9.68	17.51	17.42	45.74	43.87	33.81	29.03	3.40	8.72	3.17	2.99	3.55	
Limited Review:																
Akron MSA	55	4.92	2.76	3.64	18.38	10.91	51.56	60.00	27.30	25.45	3.04	2.82	1.63	3.43	3.45	
Canton-Massillon MSA	27	2.42	0.92	3.70	14.69	25.93	65.16	48.15	19.23	22.22	2.31	8.33	2.88	1.59	4.65	
Cincinnati-Middletown MSA	13	1.16	0.00	0.00	9.51	7.69	36.63	15.38	53.86	76.92	2.55	0.00	2.78	1.23	3.31	
Dayton MSA	125	11.19	2.03	4.00	18.03	24.80	48.40	43.20	31.54	28.00	6.11	8.93	7.36	5.11	6.72	
Huntington-Ashland MSA	41	3.67	0.00	0.00	5.05	0.00	94.95	100.00	0.00	0.00	17.01	0.00	0.00	17.83	0.00	
Mansfield MSA	1	0.09	0.16	0.00	14.17	0.00	58.08	100.00	27.58	0.00	0.18	0.00	0.00	0.31	0.00	
Sandusky MSA	14	1.25	0.00	0.00	18.57	28.57	65.56	50.00	15.87	21.43	5.60	0.00	6.15	4.35	12.50	
Springfield MSA	29	2.60	1.73	0.00	9.72	10.34	59.32	65.52	29.23	24.14	6.80	0.00	5.17	7.56	6.73	
Toledo MSA	55	4.92	2.74	1.82	13.99	20.00	56.25	45.45	27.01	32.73	3.30	1.45	3.40	2.65	5.45	
Weirton-Steubenville MSA	8	0.72	0.92	0.00	8.50	0.00	87.23	75.00	3.35	25.00	2.61	0.00	0.00	2.16	25.00	
Wheeling MSA	12	1.07	0.00	0.00	10.33	0.00	83.93	91.67	5.74	8.33	3.27	0.00	0.00	3.51	10.00	
Youngstown-Warren-Boardman MSA	32	2.86	2.74	9.38	12.34	0.00	60.78	68.75	24.14	21.88	2.15	9.68	0.00	2.39	1.95	
NonMetropolitan Areas	198	17.73	0.06	0.00	11.64	17.68	75.99	73.74	12.31	8.59	4.18	0.00	7.10	3.99	2.21	

* Based on 2004 Peer Mortgage Data (Eastern)

** Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Cleveland-Elyria-Mentor MSA	2,592	20.04	4.83	3.59	12.41	9.38	48.22	49.69	34.54	37.35	5.36	3.57	3.85	5.50	6.05	
Columbus MSA	2,711	20.96	2.94	3.32	17.51	14.90	45.74	47.55	33.81	34.23	6.15	5.57	5.78	6.65	5.75	
Limited Review:																
Akron MSA	1,053	8.14	2.76	3.80	18.38	18.90	51.56	50.90	27.30	26.40	5.98	6.09	6.01	6.13	5.68	
Canton-Massillon MSA	478	3.70	0.92	0.21	14.69	12.76	65.16	64.44	19.23	22.59	4.76	1.89	4.12	4.68	5.60	
Cincinnati-Middletown MSA	352	2.72	0.00	0.00	9.51	5.97	36.63	28.13	53.86	65.91	5.04	0.00	4.63	4.58	5.32	
Dayton MSA	1,997	15.44	2.03	1.45	18.03	13.67	48.40	46.57	31.54	38.31	9.80	8.65	8.02	9.50	11.19	
Huntington-Ashland MSA	106	0.82	0.00	0.00	5.05	5.66	94.95	94.34	0.00	0.00	10.38	0.00	11.76	10.31	0.00	
Mansfield MSA	47	0.36	0.16	0.00	14.17	17.02	58.08	68.09	27.58	14.89	1.72	0.00	2.14	2.03	0.85	
Sandusky MSA	135	1.04	0.00	0.00	18.57	20.74	65.56	65.93	15.87	13.33	8.57	0.00	8.51	9.14	6.62	
Springfield MSA	412	3.19	1.73	1.46	9.72	10.19	59.32	61.89	29.23	26.46	11.74	9.23	10.84	12.62	10.53	
Toledo MSA	816	6.31	2.74	0.98	13.99	13.36	56.25	55.15	27.01	30.51	5.47	2.73	5.26	5.44	5.83	
Weirton-Steubenville MSA	72	0.56	0.92	0.00	8.50	1.39	87.23	90.28	3.35	8.33	5.80	0.00	0.99	5.96	12.50	
Wheeling MSA	64	0.49	0.00	0.00	10.33	7.81	83.93	78.13	5.74	14.06	6.05	0.00	4.63	5.67	12.86	
Youngstown-Warren-Boardman MSA	446	3.45	2.74	1.57	12.34	13.00	60.78	60.31	24.14	25.11	4.71	6.31	5.75	4.64	4.36	
NonMetropolitan Areas	1,654	12.79	0.06	0.06	11.64	12.76	75.99	76.00	12.31	11.19	5.87	33.33	8.68	5.68	4.85	

* Based on 2004 Peer Mortgage Data (Eastern)

** Home refinance loans originated in the MA/AA as a percentage of all home refinance loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: OHIO				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans						
Full Review:																
Cleveland-Elyria-Mentor MSA	2,858	27.88	7.51	5.56	14.64	12.00	40.90	41.22	36.13	41.22	5.86	5.65	5.79	5.86	6.12	
Columbus MSA	1,761	17.18	7.39	6.30	19.94	18.46	40.17	36.80	32.50	38.44	4.42	4.90	5.03	4.22	4.51	
Limited Review:																
Akron MSA	1,056	10.30	9.23	6.63	14.49	10.70	43.42	44.03	32.86	38.64	6.61	5.70	5.78	6.64	7.54	
Canton-Massillon MSA	388	3.78	3.86	2.32	15.35	16.24	57.97	55.41	22.82	26.03	4.33	2.87	5.41	4.20	4.69	
Cincinnati-Middletown MSA	86	0.84	0.00	0.00	12.75	36.05	38.68	23.26	48.53	40.70	1.56	0.00	7.24	1.15	0.92	
Dayton MSA	1,094	10.67	6.88	8.78	20.28	23.58	43.46	31.08	29.39	36.56	6.48	9.20	8.28	4.98	7.35	
Huntington-Ashland MSA	33	0.32	0.00	0.00	15.63	24.24	84.37	75.76	0.00	0.00	4.27	0.00	10.77	3.85	0.00	
Mansfield MSA	34	0.33	2.95	8.82	21.50	5.88	51.16	64.71	24.40	20.59	1.08	2.16	0.34	1.48	0.85	
Sandusky MSA	123	1.20	0.00	0.00	26.20	23.58	58.86	55.28	14.93	21.14	6.36	0.00	6.61	5.99	8.70	
Springfield MSA	158	1.54	3.10	4.43	19.39	20.89	53.73	48.73	23.78	25.95	5.82	9.59	7.32	5.58	5.38	
Toledo MSA	706	6.89	4.45	2.97	12.29	11.33	54.74	50.00	28.52	35.69	4.76	5.36	5.20	4.58	5.19	
Weirton-Steubenville MSA	46	0.45	1.73	0.00	20.58	23.91	72.51	65.22	5.17	10.87	4.08	0.00	5.31	3.81	9.26	
Wheeling MSA	45	0.44	0.00	0.00	18.09	40.00	68.95	51.11	12.96	8.89	2.81	0.00	7.66	1.96	2.76	
Youngstown-Warren-Boardman MSA	555	5.41	5.37	4.86	15.09	15.14	51.57	53.51	27.70	26.49	5.43	7.71	6.95	5.60	4.64	
NonMetropolitan Areas	1,309	12.77	0.86	0.99	13.54	9.09	75.57	79.60	10.03	10.31	3.35	8.28	4.25	3.35	3.43	

* Based on 2004 Peer Small Business Data -- US and PR

** Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

*** Source Data - Dun and Bradstreet (2004).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: OHIO				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% of Farms [*]	% BANK Loans	% of Farms [*]	% BANK Loans	% of Farms [*]	% BANK Loans	% of Farms [*]	% BANK Loans						
Full Review:																
Cleveland-Elyria-Mentor MSA	6	3.45	1.73	0.00	5.75	0.00	50.81	33.33	41.58	66.67	3.47	0.00	0.00	1.33	7.41	
Columbus MSA	10	5.75	1.18	0.00	9.43	0.00	63.22	60.00	26.17	40.00	1.80	0.00	0.00	1.39	4.17	
Limited Review:																
Akron MSA	0	0.00	3.26	0.00	6.80	0.00	59.96	0.00	29.98	0.00	0.00	0.00	0.00	0.00	0.00	
Canton-Massillon MSA	4	2.30	0.41	0.00	7.64	0.00	76.24	100.00	15.70	0.00	2.04	0.00	0.00	2.70	0.00	
Cincinnati-Middletown MSA	0	0.00	0.00	0.00	4.62	0.00	46.72	0.00	48.66	0.00	0.00	0.00	0.00	0.00	0.00	
Dayton MSA	6	3.45	0.60	0.00	9.30	16.67	66.31	50.00	23.79	33.33	1.94	0.00	4.55	1.22	5.00	
Huntington-Ashland MSA	0	0.00	0.00	0.00	5.17	0.00	94.83	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Mansfield MSA	1	0.57	0.00	0.00	2.46	0.00	71.58	100.00	25.96	0.00	3.03	0.00	0.00	4.35	0.00	
Sandusky MSA	0	0.00	0.00	0.00	5.96	0.00	77.98	0.00	16.06	0.00	0.00	0.00	0.00	0.00	0.00	
Springfield MSA	0	0.00	0.82	0.00	4.36	0.00	52.04	0.00	42.78	0.00	0.00	0.00	0.00	0.00	0.00	
Toledo MSA	4	2.30	0.67	0.00	3.39	0.00	75.52	100.00	20.42	0.00	0.79	0.00	0.00	0.85	0.00	
Weirton-Steubenville MSA	0	0.00	1.48	0.00	5.19	0.00	92.59	0.00	0.74	0.00	0.00	0.00	0.00	0.00	0.00	
Wheeling MSA	0	0.00	0.00	0.00	2.33	0.00	95.93	0.00	1.74	0.00	0.00	0.00	0.00	0.00	0.00	
Youngstown-Warren-Boardman MSA	0	0.00	0.84	0.00	3.95	0.00	70.30	0.00	24.91	0.00	0.00	0.00	0.00	0.00	0.00	
NonMetropolitan Areas	143	82.18	0.03	0.00	3.89	0.00	78.44	78.32	17.65	21.68	1.23	0.00	0.00	0.80	3.05	

^{*} Based on 2004 Peer Small Business Data -- US and PR

^{**} Small loans to farms originated in the MA/AA as a percentage of all small loans to farms originated in the rated area.

^{***} Source Data - Dun and Bradstreet (2004).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: OHIO				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total	% Families***	% BANK Loans**	% BANK Loans ⁴	% BANK Loans**	% Families***	% BANK Loans***	% Families***	% BANK Loans***						
Full Review:																
Cleveland-Elyria-Mentor MSA	2,049	16.01	20.34	11.22	18.08	27.48	22.21	29.14	39.37	32.16	5.45	6.51	5.62	5.74	4.82	
Columbus MSA	3,295	25.75	19.39	10.38	18.38	31.71	23.09	30.56	39.13	27.34	8.14	9.87	10.27	8.83	5.83	
Limited Review:																
Akron MSA	1,007	7.87	19.24	14.90	18.62	30.69	23.21	25.72	38.93	28.70	7.84	11.31	9.59	7.34	6.05	
Canton-Massillon MSA	515	4.03	17.81	13.79	19.41	27.96	24.06	33.98	38.73	24.27	8.31	10.33	9.21	9.36	6.02	
Cincinnati-Middletown MSA	378	2.95	11.58	4.76	16.23	19.31	23.19	30.42	49.00	45.50	6.25	6.84	6.24	6.99	5.80	
Dayton MSA	2,231	17.44	19.26	10.89	18.66	26.45	22.62	28.46	39.46	34.20	14.26	15.42	14.46	14.33	13.75	
Huntington-Ashland MSA	65	0.51	23.36	9.23	18.32	30.77	22.74	33.85	35.58	26.15	8.75	12.24	13.33	9.40	5.48	
Mansfield MSA	61	0.48	17.95	14.75	19.32	24.59	23.37	29.51	39.36	31.15	3.31	3.93	3.32	3.59	2.92	
Sandusky MSA	91	0.71	19.00	17.58	18.59	18.68	23.34	27.47	39.07	36.26	8.53	14.81	6.69	8.50	8.03	
Springfield MSA	350	2.74	18.75	12.86	18.55	34.86	24.25	23.43	38.44	28.86	15.79	16.67	17.95	13.79	15.00	
Toledo MSA	829	6.48	20.18	8.44	18.07	30.76	22.67	24.97	39.08	35.83	7.39	6.78	8.90	6.64	7.08	
Weirton-Steubenville MSA	54	0.42	20.15	9.26	19.32	31.48	22.60	24.07	37.94	35.19	8.01	6.67	8.72	6.70	9.05	
Wheeling MSA	47	0.37	20.21	4.26	19.48	36.17	22.89	21.28	37.41	38.30	6.09	2.47	8.74	4.93	6.25	
Youngstown-Warren-Boardman MSA	430	3.36	18.59	15.58	18.34	29.30	22.23	28.84	40.83	26.28	6.61	9.87	7.43	6.76	4.91	
NonMetropolitan Areas	1,393	10.89	17.90	11.92	19.58	28.79	24.43	28.36	38.09	30.94	8.34	11.24	9.05	7.95	7.34	

^{*} Based on 2004 Peer Mortgage Data (Eastern)

^{**} As a percentage of loans with borrower income information available. No information was available for 4.45% of loans originated by bank.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

⁴ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: OHIO					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share [*]				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp		
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% BANK Loans ⁵	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}							
Full Review:																	
Cleveland-Elyria-Mentor MSA	348	31.64	20.34	15.52	18.08	21.84	22.21	18.97	39.37	43.68	6.12	6.63	5.25	4.22	8.12		
Columbus MSA	153	13.91	19.39	15.69	18.38	20.26	23.09	24.84	39.13	39.22	3.41	4.30	2.81	2.87	3.94		
Limited Review:																	
Akron MSA	54	4.91	19.24	7.41	18.62	29.63	23.21	14.81	38.93	48.15	3.04	1.49	3.48	1.68	4.56		
Canton-Massillon MSA	27	2.45	17.81	22.22	19.41	3.70	24.06	33.33	38.73	40.74	2.34	3.70	0.35	2.52	3.42		
Cincinnati-Middletown MSA	13	1.18	11.58	0.00	16.23	7.69	23.19	15.38	49.00	76.92	2.58	0.00	1.32	0.78	4.46		
Dayton MSA	121	11.00	19.26	12.40	18.66	22.31	22.62	23.97	39.46	41.32	5.97	4.92	5.17	5.13	7.82		
Huntington-Ashland MSA	41	3.73	23.36	7.32	18.32	19.51	22.74	29.27	35.58	43.90	17.30	9.38	16.00	16.90	21.43		
Mansfield MSA	1	0.09	17.95	0.00	19.32	0.00	23.37	100.00	39.36	0.00	0.19	0.00	0.00	0.66	0.00		
Sandusky MSA	14	1.27	19.00	14.29	18.59	21.43	23.34	14.29	39.07	50.00	5.71	5.41	4.35	3.13	9.33		
Springfield MSA	29	2.64	18.75	20.69	18.55	24.14	24.25	17.24	38.44	37.93	6.85	10.71	6.19	4.59	7.63		
Toledo MSA	54	4.91	20.18	9.26	18.07	11.11	22.67	27.78	39.08	51.85	3.28	2.21	1.61	3.16	4.87		
Weirton-Steubenville MSA	8	0.73	20.15	0.00	19.32	25.00	22.60	12.50	37.94	62.50	2.67	0.00	2.90	1.20	4.59		
Wheeling MSA	12	1.09	20.21	16.67	19.48	8.33	22.89	33.33	37.41	41.67	3.33	3.51	1.01	4.08	4.72		
Youngstown-Warren-Boardman MSA	32	2.91	18.59	18.75	18.34	21.88	22.23	18.75	40.83	40.63	2.22	3.31	1.84	1.60	2.59		
NonMetropolitan Areas	193	17.55	17.90	21.76	19.58	22.80	24.43	27.46	38.09	27.98	4.23	6.26	3.88	4.17	3.73		

^{*} Based on 2004 Peer Mortgage Data (Eastern)

^{**} As a percentage of loans with borrower income information available. No information was available for 1.53% of loans originated by bank.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

⁵ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE				Geography: OHIO				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% BANK Loans ⁶	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland-Elyria-Mentor MSA	2,477	20.77	20.34	11.18	18.08	23.74	22.21	28.10	39.37	36.98	5.58	5.88	5.34	5.49	5.72
Columbus MSA	2,347	19.68	19.39	12.53	18.38	23.22	23.09	25.65	39.13	38.60	5.89	7.32	6.20	5.51	5.62
Limited Review:															
Akron MSA	988	8.29	19.24	12.35	18.62	23.89	23.21	25.81	38.93	37.96	6.05	6.33	5.98	5.44	6.49
Canton-Massillon MSA	454	3.81	17.81	13.00	19.41	20.48	24.06	29.07	38.73	37.44	4.78	4.74	4.07	4.54	5.53
Cincinnati-Middletown MSA	323	2.71	11.58	5.57	16.23	14.24	23.19	30.03	49.00	50.15	4.94	4.59	4.04	5.44	5.03
Dayton MSA	1,740	14.59	19.26	11.78	18.66	22.53	22.62	27.47	39.46	38.22	9.40	10.78	9.06	9.11	9.45
Huntington-Ashland MSA	104	0.87	23.36	5.77	18.32	22.12	22.74	28.85	35.58	43.27	10.64	6.90	12.30	10.53	10.77
Mansfield MSA	46	0.39	17.95	10.87	19.32	21.74	23.37	34.78	39.36	32.61	1.77	2.20	1.68	1.93	1.59
Sandusky MSA	132	1.11	19.00	11.36	18.59	21.97	23.34	36.36	39.07	30.30	9.03	10.14	8.24	10.55	7.91
Springfield MSA	367	3.08	18.75	13.08	18.55	24.80	24.25	26.98	38.44	35.15	11.31	13.24	10.75	10.48	11.79
Toledo MSA	797	6.68	20.18	11.17	18.07	23.21	22.67	25.60	39.08	40.03	5.65	6.88	5.77	5.02	5.74
Weirton-Steubenville MSA	67	0.56	20.15	7.46	19.32	25.37	22.60	26.87	37.94	40.30	5.57	4.17	5.25	5.25	6.49
Wheeling MSA	62	0.52	20.21	8.06	19.48	20.97	22.89	22.58	37.41	48.39	6.26	5.62	6.05	4.70	7.80
Youngstown-Warren-Boardman MSA	434	3.64	18.59	13.59	18.34	28.11	22.23	24.88	40.83	33.41	4.83	6.91	5.70	4.09	4.32
NonMetropolitan Areas	1,587	13.31	17.90	12.92	19.58	22.68	24.43	28.67	38.09	35.73	5.94	7.79	6.05	5.63	5.68

* Based on 2004 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 7.86% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home refinance loans originated in the MA/AA as a percentage of all home refinance loans originated in the rated area.

⁶ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: OHIO			Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]		
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Cleveland-Elyria-Mentor MSA	2,888	28.07	65.09	59.94	78.81	10.63	10.56	5.86	11.35	
Columbus MSA	1,761	17.12	63.53	57.30	78.99	10.68	10.34	4.42	7.74	
Limited Review:										
Akron MSA	1,056	10.26	65.14	52.37	78.03	11.84	10.13	6.61	11.49	
Canton-Massillon MSA	388	3.77	66.35	59.28	78.35	12.63	9.02	4.33	8.67	
Cincinnati-Middletown MSA	86	0.84	65.12	50.00	60.47	20.93	18.60	1.56	2.15	
Dayton MSA	1,094	10.63	64.05	48.90	75.59	12.61	11.79	6.48	9.51	
Huntington-Ashland MSA	33	0.32	67.63	69.70	78.79	12.12	9.09	4.27	7.21	
Mansfield MSA	34	0.33	65.89	47.06	73.53	11.76	14.71	1.08	1.29	
Sandusky MSA	123	1.20	64.80	63.41	87.80	9.76	2.44	6.36	10.86	
Springfield MSA	158	1.54	66.25	61.39	85.44	8.23	6.33	5.82	8.64	
Toledo MSA	706	6.86	63.81	54.25	77.90	8.78	13.31	4.76	7.12	
Weirton-Steubenville MSA	46	0.45	65.84	54.35	89.13	10.87	0.00	4.08	7.10	
Wheeling MSA	45	0.44	63.73	55.56	93.33	6.67	0.00	2.81	3.87	
Youngstown-Warren-Boardman MSA	562	5.46	64.65	52.85	76.16	13.17	10.68	5.43	9.73	
NonMetropolitan Areas	1,309	12.72	67.29	62.95	77.92	12.30	9.78	3.35	5.11	

^{*} Based on 2004 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2004).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 10.59% of small loans to businesses originated by the bank.

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS					Geography: OHIO		Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [*]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Cleveland-Elyria-Mentor MSA	6	3.45	88.94	100.00	50.00	0.00	50.00	3.47	4.50
Columbus MSA	10	5.75	90.68	60.00	80.00	10.00	10.00	1.80	1.39
Limited Review:									
Akron MSA	0	0.00	88.83	0.00	0.00	0.00	0.00	0.00	0.00
Canton-Massillon MSA	4	2.30	94.01	100.00	75.00	25.00	0.00	2.04	2.38
Cincinnati-Middletown MSA	0	0.00	86.13	0.00	0.00	0.00	0.00	0.00	0.00
Dayton MSA	6	3.45	91.59	16.67	50.00	33.33	16.67	1.94	0.37
Huntington-Ashland MSA	0	0.00	94.83	0.00	0.00	0.00	0.00	0.00	0.00
Mansfield MSA	1	0.57	95.36	0.00	100.00	0.00	0.00	3.03	0.00
Sandusky MSA	0	0.00	91.74	0.00	0.00	0.00	0.00	0.00	0.00
Springfield MSA	0	0.00	94.01	0.00	0.00	0.00	0.00	0.00	0.00
Toledo MSA	4	2.30	93.33	100.00	75.00	0.00	25.00	0.79	0.85
Weirton-Steubenville MSA	0	0.00	93.33	0.00	0.00	0.00	0.00	0.00	0.00
Wheeling MSA	0	0.00	94.19	0.00	0.00	0.00	0.00	0.00	0.00
Youngstown-Warren-Boardman MSA	0	0.00	91.50	0.00	0.00	0.00	0.00	0.00	0.00
NonMetropolitan Areas	143	82.18	95.85	100.00	81.82	15.38	2.80	1.23	1.00

^{*} Based on 2004 Peer Small Business Data -- US and PR

^{**} Small loans to farms originated in the MA/AA as a percentage of all small loans to farms originated in the rated area.

^{***} Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2004).

^{****} Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 6.90% of small loans to farms originated by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: OHIO									
Evaluation Period: February 23, 2000 TO June 30, 2005									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Cleveland-Elyria-Mentor	9	2,961	1,214	129,059	1,223	132,020	77.47	41	30,128
Columbus 2004	4	153	1,021	6,696	1,025	6,849	4.02	10	3,027
Limited Review:									
Akron MSA	2	91	493	3,317	495	3,408	2.00	8	1,522
Canton-Massillon MSA	0	0	123	815	123	815	0.48	3	375
Cincinnati-Middletown MSA	0	0	32	582	32	582	0.34	2	3,297
Dayton MSA	3	445	440	4,961	443	5,406	3.17	4	1,947
Huntington-Ashland MSA	0	0	19	73	19	73	0.04	0	0
Mansfield MSA	0	0	6	6	6	6	0.00	0	0
Sandusky MSA	1	91	31	340	32	431	0.25	1	1
Springfield MSA	0	0	12	13	12	13	0.01	0	0
Toledo MSA	3	138	440	2,447	443	2,585	1.52	5	250
Weirton-Steubenville MSA	0	0	67	1,524	67	1,524	0.89	1	1,098
Wheeling MSA	0	0	4	62	4	62	0.04	0	0
Youngstown-Warren-Boardman MSA	0	0	191	354	191	354	0.21	1	199
NonMetropolitan Area	1	180	245	4,579	246	4,759	2.79	5	2,216
Regional/Statewide	5	919	123	10,250	128	11,169	6.55	7	9,056
Out of Assessment Area	0	0	41	353	41	353	0.21	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: OHIO EVALUATION Period: February 22, 2000 to June 30, 2005																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Cleveland-Elyria-Mentor MSA	67.78	82	23.56	4.88	19.51	43.90	31.71	2	5	0	0	-2	-1	9.74	16.77	43.79	29.67
Columbus MSA	8.13	57	16.38	7.02	28.07	28.07	36.84	4	10	-1	-2	-1	-2	6.60	22.56	42.13	28.47
Limited Review:																	
Akron MSA	4.10	27	7.76	11.11	14.81	48.15	25.93	0	2	0	-1	-1	0	6.29	21.45	48.11	24.15
Canton-Massillon MSA	1.05	14	4.02	7.14	7.14	57.14	28.57	0	1	0	0	-1	0	1.88	17.09	62.40	18.63
Cincinnati-Middletown MSA	0.31	5	1.44	0.00	20.00	0.00	80.00	1	0	0	0	0	1	0.00	10.88	38.67	50.39
Dayton MSA	5.71	35	10.06	5.71	14.29	40.00	40.00	0	1	0	0	-1	0	3.49	22.91	46.40	27.20
Huntington-Ashland MSA	0.71	3	0.86	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	6.27	93.73	0.00
Mansfield MSA	0.08	1	0.29	0.00	0.00	100.00	0.00	0	0	0	0	0	0	2.08	17.95	56.06	23.91
Sandusky MSA	0.47	3	0.86	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	24.16	61.49	14.35
Springfield MSA	0.79	6	1.72	0.00	33.33	66.67	0.00	0	0	0	0	0	0	3.37	15.18	57.07	24.38
Toledo MSA	2.38	24	6.90	4.17	12.50	50.00	33.33	0	3	0	0	-3	0	6.14	17.69	52.10	24.07
Weirton-Steubenville MSA	0.65	4	1.15	0.00	50.00	50.00	0.00	0	0	0	0	0	0	1.78	12.77	82.17	3.27
Wheeling MSA	0.31	3	0.86	0.00	33.33	33.33	33.33	0	0	0	0	0	0	0.00	12.84	81.63	5.53
Youngstown-Warren-Boardman MSA	2.28	18	5.17	5.56	11.11	66.67	16.67	4	10	-1	-5	-2	1	4.61	15.87	58.03	21.49
NonMetropolitan Area	5.24	66	18.97	1.52	16.67	75.76	6.06	1	4	0	-1	-2	0	0.19	12.70	75.73	11.38

Table 1. Lending Volume

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002						
MA/Assessment Area (2002):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
West Palm Beach AA	75.53	392	42,489	3	700	0	0	0	0	395	43,189	0.00
Limited Review:												
Naples AA	24.47	117	53,586	11	2,204	0	0	0	0	128	55,790	0.00

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: FLORIDA				Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
West Palm Beach AA	248	81.31	2.95	1.67	29.17	20.92	50.76	50.21	17.13	27.20	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Naples AA	57	18.69	0.77	1.96	0.00	0.00	30.46	15.69	68.77	82.35	0.00	0.00	0.00	0.00	0.00

* Loan Data as of December 31, 2002. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from February 23, 2000 to December 31, 2002.

* Based on 2002 Peer Mortgage Data (CE)

** Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: FLORIDA				Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp	
Full Review:																
West Palm Beach AA	144	70.59	2.95	0.00	29.17	20.00	50.76	44.00	17.13	36.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Naples AA	60	29.41	0.77	0.00	0.00	0.00	30.46	21.15	68.77	78.85	0.00	0.00	0.00	0.00	0.00	

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: FLORIDA				Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of Busines ses***	% BANK Loans****	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overal I	Low	Mod	Mid	Upp	
Full Review:																
West Palm Beach AA	3	21.43	8.67	0.00	27.91	0.00	42.08	0.00	21.33	100.00	0.02	0.00	0.01	0.02	0.02	
Limited Review:																
Naples AA	11	78.57	2.42	0.00	0.00	0.00	50.87	0.00	46.71	100.00	0.05	0.00	0.00	0.06	0.05	

* Based on 2002 Peer Mortgage Data (CE)

** Home refinance loans originated in the MA/AA as a percentage of all home refinance loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Based on 2002 Peer Small Business Data -- US and PR

** Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

*** Source Data - Dun and Bradstreet (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA					Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total*	% Families***	% BANK Loans****	% BANK Loans ⁷	% BANK Loans**	% Families**	% BANK Loans***	% Families*	% BANK Loans*	Over all	Low	Mod	Mid	Upp
Full Review:															
West Palm Beach AA	248	81.31	25.61	14.64	20.69	30.54	22.71	30.13	31.00	24.69	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Naples AA	57	18.69	10.76	7.84	15.22	5.88	18.27	7.84	55.75	78.43	0.00	0.00	0.00	0.00	0.00

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA					Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% BANK Loans ⁸	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans**	Overa ll	Low	Mod	Mid	Upp
Full Review:															
West Palm Beach AA	144	70.59	25.61	10.40	20.69	24.80	22.71	26.40	31.00	38.40	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Naples AA	60	29.41	10.76	5.77	15.22	9.62	18.27	15.38	55.75	69.23	0.00	0.00	0.00	0.00	0.00

* Based on 2002 Peer Mortgage Data (CE)

** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by bank.

*** Percentage of Families is based on the 1990 Census information.

**** Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

⁷ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: FLORIDA Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
West Palm Beach AA	3	21.43	62.82	66.67	0.00	66.67	33.33	0.02	0.05
Limited Review:									
Naples AA	11	78.57	58.63	72.73	54.55	18.18	27.27	0.05	0.12

* Based on 2002 Peer Small Business Data -- US and PR

** Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated by the bank.

Table 1. Lending Volume

LENDING VOLUME												Geography: FLORIDA		Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003	
MA/Assessment Area (2004):	% of Rated Area Loans (#) in MA/AA [*]	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans ^{**}		Total Reported Loans		% of Rated Area Deposits in MA/AA ^{***}			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)				
Full Review:															
West Palm Beach AA	79.18	251	36,891	0	0	0	0	0	0	251	36,891	0.00			
Limited Review:															
Naples AA	20.82	65	16,421	1	100	0	0	0	0	66	16,521	0.00			

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE												Geography: FLORIDA		Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003		
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [†]					
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
West Palm Beach AA	124	81.05	1.87	3.23	40.77	31.45	25.76	29.03	31.60	36.29	2.31	1.81	2.30	2.85	2.06	
Limited Review:																
Naples AA	29	18.95	0.81	0.00	9.46	0.00	40.56	79.31	49.18	20.69	2.24	0.00	0.00	4.14	0.99	

^{*} Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

^{**} The evaluation period for Community Development Loans is from January 01, 2003 to December 31, 2003.

[†] Based on 2003 Peer Mortgage Data (Eastern)

^{**} Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: FLORIDA Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003												
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
West Palm Beach AA	1	100.00	1.87	0.00	40.77	100.00	25.76	0.00	31.60	0.00	0.57	0.00	1.45	0.00	0.00
Limited Review:															
Naples AA	0	0.00	0.81	0.00	9.46	0.00	40.56	0.00	49.18	0.00	0.00	0.00	0.00	0.00	0.00

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: FLORIDA Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003												
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
West Palm Beach AA	126	77.78	1.87	0.79	40.77	43.65	25.76	15.87	31.60	39.68	1.77	1.12	2.54	1.23	1.56
Limited Review:															
Naples AA	36	22.22	0.81	2.78	9.46	8.33	40.56	41.67	49.18	47.22	1.24	2.86	1.19	1.14	1.32

* Based on 2003 Peer Mortgage Data (Eastern)

** Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
Full Review:																
West Palm Beach AA	0	0.00	8.45	0.00	45.53	0.00	30.67	0.00	15.35	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Naples AA	1	100.00	2.46	0.00	9.74	0.00	40.51	0.00	47.30	100.00	0.00	0.00	0.00	0.00	0.00	

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans***	% BANK Loans ⁹	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***						
Full Review:																
West Palm Beach AA	115	79.86	25.64	5.22	19.03	40.87	20.79	20.87	34.53	33.04	2.29	1.86	4.25	1.76	1.70	
Limited Review:																
Naples AA	29	20.14	15.23	3.45	17.02	37.93	18.63	24.14	49.12	34.48	2.36	2.08	7.91	3.63	1.18	

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

*** Source Data - Dun and Bradstreet (2003).

* Based on 2003 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 7.26% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

⁹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share													
	#	% of Total**	% Families***	% BANK Loans****	% BANK Loans ¹⁰	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
West Palm Beach	1	100.00	25.64	0.00	19.03	100.00	20.79	0.00	34.53	0.00	0.57	0.00	3.85	0.00	0.00									
Limited Review:																								
Naples AA	0	0.00	15.23	0.00	17.02	0.00	18.63	0.00	49.12	0.00	0.00	0.00	0.00	0.00	0.00									

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share													
	#	% of Total	% Families***	% BANK Loans****	% BANK Loans ¹¹	% BANK Loans***	% Families**	% BANK Loans***	% Families**	% BANK Loans**	Over all	Low	Mod	Mid	Upp									
Full Review:																								
West Palm Beach	111	77.62	25.64	15.32	19.03	23.42	20.79	26.13	34.53	35.14	1.72	3.00	1.76	1.65	1.47									
Limited Review:																								
Naples AA	32	22.38	15.23	6.25	17.02	12.50	18.63	21.88	49.12	59.38	1.22	1.47	1.01	1.32	1.21									

* Based on 2003 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 11.73% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

¹⁰ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
			Geography: FLORIDA		Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
West Palm Beach AA	0	0.00	61.65	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Naples AA	1	100.00	61.65	100.00	100.00	0.00	0.00	0.00	0.00

^{*} Based on 2003 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated by the bank.

Table 1. Lending Volume

LENDING VOLUME													Geography: FLORIDA		Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004	
MA/Assessment Area (2004):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)					
Full Review:																
West Palm Beach AA	81.18	207	30,349	0	0	0	0	0	0	207	30,349	0.00				
Limited Review:																
Naples AA	18.82	45	12,749	3	310	0	0	0	0	48	13,059	0.00				

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE																Geography: FLORIDA		Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004	
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography								
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp				
Full Review:																			
West Palm Beach AA	105	77.78	1.87	1.90	40.77	38.10	25.76	31.43	31.60	28.57	50.00	50.00	50.00	50.00	50.00				
Limited Review:																			
Naples AA	30	22.22	0.81	3.33	9.46	16.67	40.56	60.00	49.18	20.00	50.00	50.00	50.00	50.00	50.00				

* Loan Data as of December 31, 2004. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2004 to June 30, 2005.

† Based on 2004 Peer Mortgage Data (Eastern)

** Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
West Palm Beach AA	3	100.00	1.87	0.00	40.77	66.67	25.76	0.00	31.60	33.33	50.00	50.00	50.00	50.00	50.00	
Limited Review:																
Naples AA	0	0.00	0.81	0.00	9.46	0.00	40.56	0.00	49.18	0.00	50.00	50.00	50.00	50.00	50.00	

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
West Palm Beach AA	99	86.84	1.87	1.01	40.77	39.39	25.76	25.25	31.60	34.34	50.00	50.00	50.00	50.00	50.00	
Limited Review:																
Naples AA	15	13.16	0.81	13.33	9.46	0.00	40.56	53.33	49.18	33.33	50.00	50.00	50.00	50.00	50.00	

* Based on 2004 Peer Mortgage Data (Eastern)

** Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: FLORIDA		Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography							
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																		
West Palm Beach AA	0	0.00	8.26	0.00	44.32	0.00	31.38	0.00	16.05	0.00	0.00	0.00	0.00	0.00	0.00			
Limited Review:																		
Naples AA	3	100.00	2.53	33.33	9.52	0.00	41.05	0.00	46.90	66.67	0.00	0.00	0.00	0.00	0.00			

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE												Geography: FLORIDA		Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share							
	#	% of Total*	% Families***	% BANK Loans***	% Families***	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp			
Full Review:																		
West Palm Beach AA	103	78.03	25.64	3.88	19.03	36.89	20.79	20.39	34.53	38.83	50.00	50.00	50.00	50.00	50.00			
Limited Review:																		
Naples AA	29	21.97	15.23	3.45	17.02	17.24	18.63	24.14	49.12	55.17	50.00	50.00	50.00	50.00	50.00			

* Based on 2004 Peer Small Business Data -- US and PR

** Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

*** Source Data - Dun and Bradstreet (2004).

* Based on 2004 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 2.22% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
West Palm Beach AA	3	100.00	25.64	0.00	19.03	0.00	20.79	66.67	34.53	33.33	50.00	50.00	50.00	50.00	50.00
Limited Review:															
Naples AA	0	0.00	15.23	0.00	17.02	0.00	18.63	0.00	49.12	0.00	50.00	50.00	50.00	50.00	50.00

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004									
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp
Full Review:															
West Palm Beach AA	92	85.98	25.64	7.61	19.03	27.17	20.79	30.43	34.53	34.78	50.00	50.00	50.00	50.00	50.00
Limited Review:															
Naples AA	15	14.02	15.23	0.00	17.02	6.67	18.63	20.00	49.12	73.33	50.00	50.00	50.00	50.00	50.00

* Based on 2004 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

* Based on 2004 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 7.07% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Refinance loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: FLORIDA									
Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
West Palm Beach AA	0	0.00	62.57	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Naples AA	3	100.00	63.68	100.00	66.67	33.33	0.00	0.00	0.00

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: FLORIDA									
Evaluation Period: February 23, 2000 TO June 30, 2005									
MA/Assessment Area:	Prior Period Investments [*]		Current Period Investments		Total Investments			Unfunded Commitments ^{**}	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
West Palm Beach AA	0	0	2	4	2	4	0.00	0	0
Limited Review:									
Naples AA	0	0	1	1,500	1	1,500	0.00	0	0

^{*} Based on 2004 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2004).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated by the bank.

'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

^{**} 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: FLORIDA Evaluation Period: February 23, 2000 TO June 30, 2005																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
West Palm Beach AA	0.00	1	50.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	5.10	48.21	25.12	21.56
Limited Review:																	
Naples AA	0.00	1	50.00	0.00	0.00	0.00	100.00	0	0	0	0	0	0	2.95	15.45	43.15	38.44

Table 1. Lending Volume

LENDING VOLUME		Geography: ILLINOIS				Evaluation Period: FEBRUARY 1, 2000 TO DECEMBER 31, 2002						
MA/Assessment Area (2002):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Chicago AA	100.00	371	71,019	75	12,097	0	0	1	3,000	447	86,116	0.00

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: ILLINOIS				Evaluation Period: FEBRUARY 1, 2000 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total **	% Owner Occ Units ***	% BANK Loans ****	% Owner Occ Units ***	% BANK Loans	% Owner Occ Units ***	% BANK Loans	% Owner Occ Units ***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Chicago AA	186	100.00	0.00	1.25	0.20	20.63	10.55	11.88	89.24	66.55	2.55	0.00	3.30	2.71	2.31

* Loan Data as of December 31, 2002. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from February 22, 2000 to December 31, 2002.

† Based on 2002 Peer Mortgage Data (CE)

** Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: ILLINOIS				Evaluation Period: FEBRUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Chicago AA	1	100.00	0.00	0.00	0.20	0.00	10.55	0.00	89.24	100.00	0.00	0.00	0.00	0.00	0.00	

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: ILLINOIS				Evaluation Period: FEBRUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Chicago AA	184	100.00	0.00	1.18	0.20	14.20	10.55	8.28	89.24	76.33	2.35	1.16	2.26	1.91	2.46	

* Based on 2002 Peer Mortgage Data (CE)

** Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: ILLINOIS				Evaluation Period: FEBRUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
Full Review:																
Chicago AA	75	0.00	0.44	1.75	7.70	14.04	1.76	3.51	76.33	80.70	0.25	0.24	0.20	0.25	0.27	

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: ILLINOIS				Evaluation Period: FEBRUARY 1, 2000 TO DECEMBER 31, 2002					Market Share				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans***	% BANK Loans ¹²	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***						
Full Review:																
Chicago AA	186	100.00	15.88	1.12	8.40	12.92	15.92	28.09	59.79	57.87	2.58	1.67	1.88	2.82	2.69	

* Based on 2002 Peer Small Business Data -- US and PR

** Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

*** Source Data - Dun and Bradstreet (2002).

Based on 2002 Peer Mortgage Data (CE)

** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by bank.

*** Percentage of Families is based on the 1990 Census information.

**** Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

¹² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: ILLINOIS					Evaluation Period: FEBRUARY 1, 2000 TO DECEMBER 31, 2002					Market Share				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% BANK Loans ¹³	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Chicago AA	1	100.00	15.88	0.00	8.40	0.00	15.92	0.00	59.79	100.00	0.00	0.00	0.00	0.00	0.00	

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: ILLINOIS					Evaluation Period: FEBRUARY 1, 2000 TO DECEMBER 31, 2002					Market Share				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% BANK Loans ¹⁴	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**						
Full Review:																
Chicago AA	184	100.00	15.88	1.78	8.40	8.28	15.92	24.85	59.79	65.09	2.27	1.37	2.72	2.23	2.22	

* Based on 2002 Peer Mortgage Data (CE)

** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by bank.

*** Percentage of Families is based on the 1990 Census information.

**** Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

¹³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: ILLINOIS			Evaluation Period: FEBRUARY 1, 2000 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Chicago AA	75	100.00	69.86	52.00	72.00	9.33	18.67	0.25	0.58

^{*} Based on 2002 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated by the bank.

Table 1. Lending Volume

LENDING VOLUME		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
MA/Assessment Area (2003):	% of Rated Area Loans (#) in MA/AA [*]	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans ^{**}		Total Reported Loans		% of Rated Area Deposits in MA/AA ^{***}
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Chicago AA	100.00	251	51,687	45	8,357	0	0	0	0	296	60,044	0.00

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]				
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Chicago AA	102	100.00	0.30	0.97	0.00	0.00	1.63	3.92	98.07	96.08	0.00	0.00	0.00	0.00	0.00

^{*} Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

^{**} The evaluation period for Community Development Loans is from February 23, 2000 to December 31, 2002.

^{*} Based on 2003 Peer Mortgage Data (Eastern)

^{**} Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: ILLINOIS Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003															
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% Owner Occ****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:															
Chicago AA	149	100.00	0.30	0.00	0.00	1.34	1.63	6.71	98.07	91.95	0.00	0.00	0.00	0.00	0.00

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: ILLINOIS Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overal I	Low	Mod	Mid	Upp
Full Review:															
Chicago AA	45	100.00	0.28	0.00	5.99	24.44	7.46	2.22	86.28	73.33	0.32	0.07	0.32	0.23	0.45

* Based on 2003 Peer Mortgage Data (Eastern)

** Home refinance loans originated in the MA/AA as a percentage of all home refinance loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total [*]	% Families ^{***}	% BANK Loans ^{****}	% BANK Loans ¹⁵	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{***}	% Families ^{**}	% BANK Loans ^{**}	Over all	Low	Mod	Mid	Upp
Full Review:															
Chicago AA	93	100.00	10.34	2.15	10.01	16.13	13.50	22.58	66.15	59.14	0.00	0.00	0.00	0.00	0.00

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% BANK Loans ¹⁷	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{**}	Over all	Low	Mod	Mid	Upp
Full Review:															
Chicago AA	138	100.00	10.34	2.90	10.01	6.52	13.50	28.99	66.15	61.59	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2003 Peer Mortgage Data (Eastern)

^{**} As a percentage of loans with borrower income information available. No information was available for 8.74% of loans originated and purchased by bank.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

¹⁵ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

^{*} Based on 2003 Peer Mortgage Data (Eastern)

^{**} As a percentage of loans with borrower income information available. No information was available for 7.38% of loans originated and purchased by bank.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} Refinance loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

¹⁶ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: ILLINOIS			Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Chicago AA	45	100.00	51.66	60.00	55.56	24.44	20.00	0.32	0.56

^{*} Based on 2003 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 4.44% of small loans to businesses originated by the bank.

Table 1. Lending Volume

LENDING VOLUME		Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004						
MA/Assessment Area (2003):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Chicago AA	100.00	161	39,908	48	7,116	0	0	0	0	209	47,024	0.00

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% Owner Occ****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Chicago AA	105	100.00	0.39	1.90	0.00	0.00	1.63	3.81	97.98	94.29	0.00	0.00	0.00	0.00	0.00

* Loan Data as of December 31, 2004. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2004 to June 30, 2005.

† Based on 2004 Peer Mortgage Data (Eastern)

** Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% Owner Occ Units****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Chicago AA	1	100.00	0.39	0.00	0.00	0.00	1.63	0.00	97.98	100.00	0.00	0.00	0.00	0.00	0.00

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% Owner Occ Units****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Chicago AA	55	100.00	0.39	0.00	0.00	0.00	1.63	0.00	97.98	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 2004 Peer Mortgage Data (Eastern)

** Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: ILLINOIS Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago AA	48	100.00	0.47	0.00	5.80	4.17	7.50	2.08	86.24	93.75	0.00	0.00	0.00	0.00	0.00

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: ILLINOIS Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004															
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total*	% Families***	% BANK Loans***	% BANK Loans ¹⁸	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago AA	104	100.00	14.30	1.92	10.04	6.73	12.79	23.08	62.87	68.27	0.00	0.00	0.00	0.00	0.00

* Based on 2004 Peer Small Business Data -- US and PR

** Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

*** Source Data - Dun and Bradstreet (2004).

Based on 2004 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 0.96% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

¹⁸ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% BANK Loans ¹⁹	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Chicago AA	1	100.00	14.30	0.00	10.04	100.00	12.79	0.00	62.87	0.00	0.00	0.00	0.00	0.00	0.00	

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% BANK Loans ²¹	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**						
Full Review:																
Chicago AA	54	100.00	14.30	0.00	10.04	14.81	12.79	16.67	62.87	68.52	0.00	0.00	0.00	0.00	0.00	

* Based on 2004 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

¹⁹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

** Based on 2004 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 1.82% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Refinance loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

²⁰ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: ILLINOIS Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Chicago AA	48	100.00	52.10	60.42	68.75	14.58	16.67	0.00	0.00

^{*} Based on 2004 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2004).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 2.08% of small loans to businesses originated by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: ILLINOIS		Evaluation Period: FEBRUARY 23, 2000 TO JUNE 30, 2005					
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Chicago AA	0	0	0	0	0	0	0	0	0
Regional/Statewide	0	0	136	3,600	136	3,600	100.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: ILLINOIS Evaluation Period: FEBRUARY 23, 2000 TO JUNE 30, 2005																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Chicago AA	0.00	1	100.00	0.00	0.00	0.00	100.00	0	0	0	0	0	0	4.41	1.32	2.26	92.02

Table 1. Lending Volume

LENDING VOLUME		Geography: MICHIGAN				Evaluation Period: JUNE 1, 2000 TO DECEMBER 31, 2002						
MA/Assessment Area (2002):	% of Rated Area Loans (#) in MA/AA [*]	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans ^{**}		Total Reported Loans		% of Rated Area Deposits in MA/AA ^{***}
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Birmingham AA	100.00	336	98,045	140	20,968	0	0	0	0	476	119,013	0.00

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MICHIGAN				Evaluation Period: JUNE 1, 2000 TO DECEMBER 31, 2002										
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]					
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
Birmingham AA	116	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	7.49	0.00	0.00	0.00	7.49

^{*} Loan Data as of December 31, 2002. Rated area refers to either state or multi-state MA rating area.

^{**} The evaluation period for Community Development Loans is from February 23, 2000 to December 31, 2002.

^{*} Based on 2002 Peer Mortgage Data (CE)

^{**} Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: MICHIGAN				Evaluation Period: JUNE 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Birmingham AA	4	100.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	1.79	0.00	0.00	0.00	1.79	

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MICHIGAN				Evaluation Period: JUNE 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Birmingham AA	216	100.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	4.37	0.00	0.00	0.00	4.37	

* Based on 2002 Peer Mortgage Data (CE)

** Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: MICHIGAN					Evaluation Period: JUNE 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% of Business ^{***}	% BANK Loans	% of Business ^{***}	% BANK Loans	% of Business ^{***}	% BANK Loans	% of Business ^{***}	% BANK Loans						
Full Review:																
Birmingham AA	140	100.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	3.07	4.18	3.83	3.51	2.80	

^{*} Based on 2002 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

^{***} Source Data - Dun and Bradstreet (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MICHIGAN					Evaluation Period: JUNE 1,2000 TO DECEMBER 31, 2002					Market Share [*]				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total [*]	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{***}	% Families ^{***}	% BANK Loans [*]						
Full Review:																
Birmingham AA	116	100.00	5.93	3.48	8.63	12.17	15.82	13.04	69.62	71.30	7.65	23.08	6.82	3.70	8.31	

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MICHIGAN					Evaluation Period: JUNE 1, 2000 TO DECEMBER 31, 2002					Market Share [*]				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}						
Full Review:																
Birmingham AA	4	100.00	5.93	0.00	8.63	0.00	15.82	25.00	69.62	75.00	1.79	0.00	0.00	0.00	3.03	

^{*} Based on 2002 Peer Mortgage Data (CE)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by bank.

^{***} Percentage of Families is based on the 1990 Census information.

^{****} Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MICHIGAN				Evaluation Period: JUNE 1, 2000 TO DECEMBER 31, 2002					Market Share [*]				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overa II	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families* ^{**}	% BANK Loans ^{****}	% Families* ^{**}	% BANK Loans ^{****}	% Families* ^{**}	% BANK Loans ^{****}						
Full Review:																
Birmingham AA	216	100.00	5.93	0.96	8.63	0.96	15.82	12.02	69.62	86.06	4.35	2.33	0.52	2.58	5.30	

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: MICHIGAN				Evaluation Period: JUNE 1, 2000 TO DECEMBER 31, 2002					Market Share [*]	
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			All	Rev\$ 1 Million or Less				
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000						
Full Review:													
Birmingham AA	140	100.00	71.67	55.71	68.57	12.74	19.29	3.07	7.49				

^{*} Based on 2002 Peer Mortgage Data (CE)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by bank.

^{***} Percentage of Families is based on the 1990 Census information.

^{****} Home refinance loans originated in the MA/AA as a percentage of all home refinance loans originated in the rated area.

^{*} Based on 2002 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated by the bank.

Table 1. Lending Volume

LENDING VOLUME		Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003						
MA/Assessment Area (2003):	Ch % of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Birmingham AA	100.00	165	50,899	39	7,123	0	0	0	0	204	58,022	0.00

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Birmingham AA	45	100.00	0.00	0.00	0.00	0.00	30.61	35.56	69.39	64.44	6.50	0.00	0.00	6.78	6.36

* Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2003 to December 31, 2003.

* Based on 2003 Peer Mortgage Data (Eastern)

** Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: MICHIGAN Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003															
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Birmingham AA	1	100.00	0.00	0.00	0.00	0.00	30.61	100.00	69.39	0.00	2.50	0.00	0.00	5.26	0.00

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: MICHIGAN Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003															
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Birmingham AA	119	100.00	0.00	0.00	0.00	0.00	30.61	19.33	69.39	80.67	3.85	0.00	0.00	2.79	4.23

* Based on 2003 Peer Mortgage Data (Eastern)

** Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: MICHIGAN					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
Full Review:																
Birmingham AA	39	100.00	0.00	0.00	0.00	0.00	42.39	38.46	57.61	61.54	2.79	3.93	3.39	2.94	2.69	

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MICHIGAN					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans***	% Families***	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***						
Full Review:																
Birmingham AA	44	100.00	5.90	0.00	8.36	13.64	13.73	20.45	72.01	65.91	6.52	0.00	10.17	6.52	6.18	

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

*** Source Data - Dun and Bradstreet (2003).

* Based on 2003 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 2.22% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Birmingham AA	1	100.00	5.90	0.00	8.36	0.00	13.73	100.00	72.01	0.00	2.50	0.00	0.00	7.14	0.00	

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families**	% BANK Loans***	% Families**	% BANK Loans***	% Families**	% BANK Loans**						
Full Review:																
Birmingham AA	103	100.00	5.90	0.00	8.36	1.94	13.73	18.45	72.01	79.61	3.56	0.00	0.87	3.63	3.97	

* Based on 2003 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

* Based on 2003 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 13.45% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Refinance loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

²² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: MICHIGAN Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Birmingham AA	39	100.00	66.61	61.54	61.54	20.51	17.95	2.79	5.30

^{*} Based on 2003 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 5.13% of small loans to businesses originated by the bank.

Table 1. Lending Volume

LENDING VOLUME												Geography: MICHIGAN		Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004	
MA/Assessment Area (2004):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)				
Full Review:															
Birmingham AA	100.00	84	26,660	28	2,893	0	0	0	0	112	29,553	0.00			

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: MICHIGAN		Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004	
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp			
Full Review:																		
Birmingham AA	30	100.00	0.00	0.00	0.00	0.00	30.61	40.00	69.39	60.00	4.32	0.00	0.00	4.69	4.10			

* Loan Data as of December 31, 2004. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2004 to June 30, 2005.

* Based on 2004 Peer Mortgage Data (Eastern)

** Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans						
Full Review:																
Birmingham AA	3	100.00	0.00	0.00	0.00	0.00	30.61	33.33	69.39	66.67	4.55	0.00	0.00	3.23	5.71	

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans						
Full Review:																
Birmingham AA	51	100.00	0.00	0.00	0.00	0.00	30.61	17.65	69.39	82.35	4.13	0.00	0.00	2.66	4.68	

^{*} Based on 2004 Peer Mortgage Data (Eastern)

^{**} Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: MICHIGAN		Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography										
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Birmingham AA	28	100.00	0.00	0.00	0.00	0.00	40.89	39.29	59.11	60.71	2.63	4.93	2.50	2.56	2.68						

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: MICHIGAN		Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share										
	#	% of Total*	% Families***	% BANK Loans***	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Birmingham AA	29	100.00	8.16	0.00	10.68	20.69	16.04	6.90	65.12	72.41	4.34	0.00	6.82	1.56	4.84						

* Based on 2004 Peer Small Business Data -- US and PR

** Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

*** Source Data - Dun and Bradstreet (2004).

* Based on 2004 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 3.33% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Birmingham AA	3	100.00	8.16	0.00	10.68	0.00	16.04	33.33	65.12	66.67	4.76	0.00	0.00	7.14	5.41	

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families**	% BANK Loans***	% Families**	% BANK Loans***	% Families**	% BANK Loans**						
Full Review:																
Birmingham AA	51	100.00	8.16	0.00	10.68	7.84	16.04	13.73	65.12	78.43	4.29	0.00	3.25	2.97	5.05	

* Based on 2004 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home improvement loans originated in the MA/AA as a percentage of all home improvement loans originated in the rated area.

* Based on 2004 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Refinance loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

²⁴ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MICHIGAN			Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Birmingham AA	28	100.00	68.03	50.00	82.14	10.71	7.14	2.63	5.73

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MICHIGAN			Evaluation Period: February 23, 2000 TO June 30, 2005				
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Birmingham AA	0	0	0	0	0	0	0	0	0
Regional/Statewide	0	0	139	6,500	139	6,500	100.00	0	0

* Based on 2004 Peer Small Business Data -- US and PR

** Small loans to businesses originated in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2004).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated by the bank.

'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: MICHIGAN Evaluation Period: February 23, 2000 TO June 30, 2005																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Birmingham AA	0.00	1	100.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	29.37	70.63

Table 1. Lending Volume

LENDING VOLUME		Geography: PENNSYLVANIA				Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002						
MA/Assessment Area (2002):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Philadelphia AA	100.00	90	15,130	4	780	0	0	1	13	95	15,923	0.00

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: PENNSYLVANIA				Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total **	% Owner Occ Units ***	% BANK Loans	% Owner Occ Units ***	% BANK Loans	% Owner Occ Units ***	% BANK Loans	% Owner Occ Units ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Philadelphia AA	43	100.00	1.38	0.00	0.00	0.00	10.64	20.93	87.99	79.07	0.00	0.00	0.00	0.00	0.00

* Loan Data as of December 31, 2002. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from February 23, 2000 to December 31, 2002.

* Based on 2002 Peer Mortgage Data (CE)

** Home purchase loans originated in the MA/AA as a percentage of all home purchase loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: PENNSYLVANIA				Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Philadelphia AA	3	100.00	1.38	0.00	0.00	0.00	10.64	0.00	87.99	100.00	0.00	0.00	0.00	0.00	0.00	

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: PENNSYLVANIA				Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Philadelphia AA	44	100.00	1.38	0.00	0.00	0.00	10.64	13.89	87.99	86.11	0.00	0.00	0.00	0.00	0.00	

* Based on 2002 Peer Mortgage Data (CE)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: PENNSYLVANIA				Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% of Business ^{***}	% BANK Loans	% of Business ^{***}	% BANK Loans	% of Business ^{***}	% BANK Loans	% of Business ^{***}	% BANK Loans						
Full Review:																
Philadelphia AA	4	100.00	12.99	0.00	0.00	0.00	38.77	50.00	48.24	50.00	0.02	0.00	0.02	0.01	0.03	

^{*} Based on 2002 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

^{***} Source Data - Dun and Bradstreet (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: PENNSYLVANIA					Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share [*]				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total [*]	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{***}	% Families ^{***}	% BANK Loans [*]						
Full Review:																
Philadelphia AA	43	100.00	11.20	2.33	10.57	16.28	18.28	20.93	59.94	60.47	0.00	0.00	0.00	0.00	0.00	

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: PENNSYLVANIA					Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share [*]				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}						
Full Review:																
Philadelphia AA	3	100.00	11.20	0.00	10.57	33.33	18.28	0.00	59.94	66.67	0.00	0.00	0.00	0.00	0.00	

^{*} Based on 2002 Peer Mortgage Data (CE)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by bank.

^{***} Percentage of Families is based on the 1990 Census information.

^{****} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: PENNSYLVANIA					Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share													
	#	% of Total**	% Families***	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans**	Overa ll	Low	Mod	Mid	Upp									
Full Review:																								
Philadelphia AA	44	100.00	11.20	2.78	10.57	5.56	18.28	27.78	59.94	63.89	0.00	0.00	0.00	0.00	0.00									

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES										Geography: PENNSYLVANIA					Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share											
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less										
Full Review:																			
Philadelphia AA	4	100.00	53.99	50.00	50.00	0.00	50.00	0.02	0.05										

* Based on 2002 Peer Mortgage Data (CE)

** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by bank.

*** Percentage of Families is based on the 1990 Census information.

**** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated in the rated area.

* Based on 2002 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated by the bank.

Table 1. Lending Volume

LENDING VOLUME		Geography: PENNSYLVANIA						Evaluation Period: JANUARY 1, 2003 TO DECEMBER 30, 2003				
MA/Assessment Area (2004):	% of Rated Area Loans (#) in MA/AA [*]	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans ^{**}		Total Reported Loans		% of Rated Area Deposits in MA/AA ^{***}
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Philadelphia AA	100.00	59	13,452	7	1,099	0	0	1	9	67	14,560	0.00

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: PENNSYLVANIA						Evaluation Period: JANUARY 1, 2003 TO DECEMBER 30, 2003							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]				
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Philadelphia AA	26	100.00	0.72	7.69	12.36	3.85	8.04	3.85	78.88	84.62	3.70	8.00	3.85	2.19	3.88

^{*} Loan Data as of December 30, 2003. Rated area refers to either state or multi-state MA rating area.

^{**} The evaluation period for Community Development Loans is from January 01, 2005 to December 31, 2005.

^{*} Based on 2003 Peer Mortgage Data (Eastern)

^{**} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 30, 2003					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Philadelphia AA	2	100.00	0.72	0.00	12.36	0.00	8.04	0.00	78.88	100.00	2.88	0.00	0.00	0.00	3.61	

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 30, 2003					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Philadelphia AA	31	100.00	0.72	0.00	12.36	0.00	8.04	6.45	78.88	93.55	1.47	0.00	0.00	1.92	1.44	

* Based on 2003 Peer Mortgage Data (Eastern)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: PENNSYLVANIA		Evaluation Period: JANUARY 1, 2003 TO DECEMBER 30, 2003		
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography					
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Philadelphia AA	7	100.00	12.11	0.00	16.92	0.00	26.11	14.29	44.86	85.71	0.00	0.00	0.00	0.00	0.00	

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE												Geography: PENNSYLVANIA		Evaluation Period: JANUARY 1, 2003 TO DECEMBER 30, 2003		
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share					
	#	% of Total*	% Families***	% BANK Loans***	% Families***	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full Review:																
Philadelphia AA	26	100.00	13.98	0.00	14.87	15.38	14.70	19.23	56.44	65.38	3.85	0.00	5.80	4.67	3.51	

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

*** Source Data - Dun and Bradstreet (2003).

* Based on 2003 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated in the rated area.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 30, 2003					Market Share [†]				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}						
Full Review:																
Philadelphia AA	2	100.00	13.98	0.00	14.87	0.00	14.70	100.00	56.44	0.00	3.00	0.00	5.56	6.90	0.00	

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 30, 2003					Market Share [†]				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{**}						
Full Review:																
Philadelphia AA	26	100.00	13.98	3.85	14.87	15.38	14.70	15.38	56.44	65.38	1.36	1.96	1.55	1.13	1.38	

[†] Based on 2003 Peer Mortgage Data (Eastern)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by bank.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated in the rated area.

[†] Based on 2003 Peer Mortgage Data (Eastern)

^{**} As a percentage of loans with borrower income information available. No information was available for 16.13% of loans originated by bank.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} Refinance loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated in the rated area.

²⁵ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: PENNSYLVANIA			Evaluation Period: JANUARY 1, 2003 TO DECEMBER 30, 2003				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Philadelphia AA	7	100.00	53.11	14.29	71.43	14.29	14.28	0.00	0.00

^{*} Based on 2003 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 14.29% of small loans to businesses originated by the bank.

Table 1. Lending Volume

LENDING VOLUME		Geography: PENNSYLVANIA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004				
MA/Assessment Area (2004):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Philadelphia AA	100.00	28	7,534	1	8	0	0	1	23	30	7,565	0.00

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: PENNSYLVANIA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *				
	#	% of Total **	% Owner Occ Units ***	% BANK Loans	% Owner Occ Units ***	% BANK Loans	% Owner Occ Units ***	% BANK Loans	% Owner Occ Units ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Philadelphia AA	14	100.00	0.72	7.14	12.36	0.00	8.04	7.14	78.88	85.71	1.30	0.55	0.00	0.00	1.66

* Loan Data as of December 31, 2004. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2005 to December 31, 2005.

*** Deposit Data as of August 08, 2006. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

* Based on 2004 Peer Mortgage Data (Eastern)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: PENNSYLVANIA					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography					
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full Review:																
Philadelphia AA	2	100.00	0.72	0.00	12.36	0.00	8.04	0.00	78.88	100.00	2.30	0.00	0.00	0.00	2.74	

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: PENNSYLVANIA					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004									
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography					
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
Philadelphia AA	12	100.00	0.72	0.00	12.36	8.33	8.04	8.33	78.88	83.33	1.41	0.00	5.56	1.85	1.31	

* Based on 2004 Peer Mortgage Data (Eastern)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
Full Review:																
Philadelphia AA	1	100.00	12.93	0.00	16.97	0.00	25.35	0.00	44.75	100.00	0.03	0.02	0.06	0.00	0.03	

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans***	% Families***	% BANK Loans**	% Families***	% BANK Loans***	% Families**	% BANK Loans***						
Full Review:																
Philadelphia AA	13	100.00	13.98	7.69	14.87	0.00	14.70	23.08	56.44	69.23	1.31	8.33	0.00	2.07	1.19	

* Based on 2004 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

*** Source Data - Dun and Bradstreet (2004).

* Based on 2004 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 7.14% of loans originated by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated in the rated area.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share [*]				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}						
Full Review:																
Philadelphia AA	2	100.00	13.98	0.00	14.87	0.00	14.70	0.00	56.44	100.00	2.33	0.00	0.00	0.00	3.57	

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share [*]				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}						
Full Review:																
Philadelphia AA	12	100.00	13.98	0.00	14.87	16.67	14.70	16.67	56.44	66.67	1.67	0.00	2.30	1.79	1.62	

^{*} Based on 2004 Peer Mortgage Data (Eastern)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by bank.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated in the rated area.

^{*} Based on 2004 Peer Mortgage Data (Eastern)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by bank.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} Refinance loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated in the rated area.

²⁶ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: PENNSYLVANIA			Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Philadelphia AA	1	100.00	54.44	100.00	100.00	0.00	0.00	0.03	0.08

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: PENNSYLVANIA			Evaluation Period: February 23, 2000 TO June 30, 2005				
MA/Assessment Area:	Prior Period Investments [*]		Current Period Investments		Total Investments			Unfunded Commitments ^{**}	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Philadelphia AA	0	0	9	35	9	35	100.00	0	0

^{*} Based on 2004 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated in the rated area.

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2004).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated by the bank.

^{*} 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

^{**} 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: PENNSYLVANIA Evaluation Period: February 23, 2000 TO June 30, 2005																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Philadelphia AA	0.00	1	100.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	5.06	8.76	17.98	68.20